

The Missouri Guide to the National Register Process

Completed by the Missouri State Historic Preservation Office

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Introduction

The National Register of Historic Places, administered by the National Park Service, is the official list of the Nation's historic places considered worthy of documentation and preservation. In order for a property to be listed in the National Register it must go through a nomination process and a completed registration form must be submitted to the State Historic Preservation Office (SHPO) for review.

Anyone can prepare a National Register nomination, and SHPO staff is here to help guide individuals through this process. For those who would like to get a property listed but do not want to write the nomination themselves, there are consultants who can be hired to complete this process. In these cases, the SHPO will communicate with the consultant concerning the preparation of the National Register nomination. However, you can reach out to the SHPO and specifically request to be copied in any correspondence related to your project. While the SHPO does not endorse or recommend any particular consultants, a list of those who provide these services in Missouri is available on our website. This list can be accessed online here: <https://mostateparks.com/page/84241/archaeology-and-historic-preservation-consultants-list-and-professional-qualifications>

The Missouri Guide to the National Register Process was created to assist in the completion of the National Register form. It is intended to supplement, but not replace, the [National Register Bulletin 16A: How to Complete the National Register Registration Form](#)¹. The guide includes Missouri's submission standards for National Register nominations in addition to providing technical assistance and clarification on common issues. This guide will be reviewed periodically and updated as needed.

The Missouri State Historic Preservation Office and the National Register and Survey Section:

The State Historic Preservation Office (SHPO) is part of the Division of State Parks within the Missouri Department of Natural Resources. It is responsible, in partnership with the U.S. Department of the Interior's National Park Service and local governments, for carrying out the mandates of the National Historic Preservation Act (P.L. 89-665, as amended) in Missouri. The SHPO works with citizens and groups throughout the state to identify, evaluate, and protect Missouri's diverse range of historic, architectural, and archaeological resources.

¹ National Register Bulletins are noted throughout this document and will not always include a link. They will sometimes be referred to as "NR Bulletins" or "Bulletin" that may be followed by a number. All NR Bulletins can be found on the NPS National Register Publication page: <https://www.nps.gov/subjects/nationalregister/publications.htm>

The National Register and Survey Section coordinates architectural survey and National Register projects. For National Register purposes, program staff reviews and provides guidance on draft nominations to the National Register of Historic Places and schedules qualifying nominations for Missouri Advisory Council on Historic Preservation (MOACHP) meetings. Staff also assists with evaluating historic resources to determine eligibility for listing in the National Register via the Eligibility Assessment (EA) process. Due to limited resources, staff generally cannot write a nomination or conduct research for a preparer. As such, program staff members strive to establish a working relationship with the preparer so they have the tools necessary to complete a nomination that meets the National Park Service's (NPS) standards. The goal is to ensure a nomination is as strong as possible, improving the chances it will be listed in the National Register of Historic Places.

The National Register Process:

See the [introduction](#) page concerning who can prepare a National Register nomination. Prior to the completion of a National Register nomination, an [Eligibility Assessment](#) is strongly recommended.

When the SHPO receives a National Register nomination, staff must review and provide comments to the preparer within 45-60 days of receipt of a nomination per federal regulation 36 CFR Part 60². Generally this review revolves around the meeting dates of the Missouri Advisory Council on Historic Preservation, or MOACHP³.

The MOACHP is a body of preservation professionals and laypersons appointed by the Governor to review National Register nominations and provide input on preservation issues. To be considered for one of these meetings, the SHPO must receive a substantially complete draft of the nomination by the established deadline. The submission deadlines are scheduled annually and are available on the SHPO website.

Link to MOACHP meeting dates and submission deadlines:

<https://mostateparks.com/page/85656/nominations-national-register>

Once a submission deadline has passed, program staff will divide the nominations and assign a primary reviewer to each project. Complex nominations may have more than one reviewer. The primary reviewer will establish contact with the preparer and provide comments on their nomination. Unless a nomination is nearly perfect, which is a rarity, a second draft will be required by a specific deadline. The revised drafts are reviewed and comments are provided to the preparers. If the nomination is considered sufficient it will be scheduled for the upcoming MOACHP meeting.⁴ The topic of [scheduling decisions](#) is discussed in more detail below.

² 36 CFR 60 regulations are noted throughout this document. They can be found online at: https://www.ecfr.gov/cgi-bin/text-idx?SID=b36f494ab8c19284178b4c593eda2a8f&tpl=/ecfrbrowse/Title36/36cfr60_main_02.tpl

³ The Guide references the Missouri Advisory Council on Historic Preservation as "MOACHP" or "Council".

⁴ The topic of scheduling decisions is discussed in the subsection ["How does the SHPO decide what is scheduled for the MOACHP agenda?"](#) below.

Shortly afterwards, copies of scheduled nominations are sent to members of the Advisory Council. The MOACHP will have approximately 30 days to review the nominations prior to the meeting.

On the day of a MOACHP meeting, the preparer will give a brief (approximately 10 minutes) PowerPoint or similar presentation to the Council on the property. The preparer will provide SHPO staff with an electronic copy of the presentation at least one week prior to the meeting. Immediately after the presentation, the Council votes on whether or not to approve the nomination to be forwarded to the National Park Service (NPS) in Washington D.C. Alternatively, the Council may vote to table the nomination to a later meeting date.

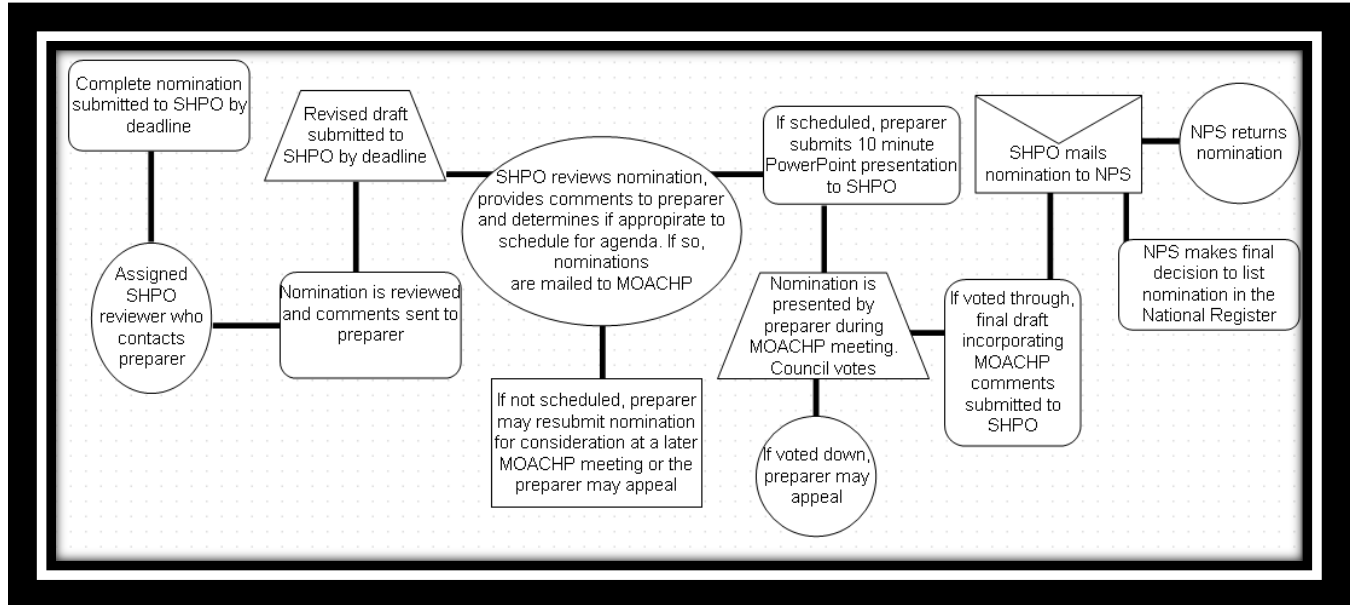
Members of the MOACHP may have questions or provide suggestions and comments for improving the nomination. If the Council approves the nomination, a final draft incorporating any Council or remaining SHPO comments will be due to the SHPO approximately 30 days after the MOACHP meeting.⁵ If the MOACHP does not approve the nomination, the preparer has the option to appeal the decision as outlined in 36 CFR Part 60.12.

Once the SHPO has received a final nomination, program staff will check it for technical correctness and then send it to the NPS. The NPS will list the nominated property in the National Register, deny it, or return it for more information. Per federal regulations, the NPS has 45 business days to list the property in the National Register if approved. However, if the NPS decides to deny or return the nomination, there is no set time limit on when the SHPO is notified or when any comments from the NPS are provided to the SHPO. The SHPO has no control over how long it may take the NPS to provide feedback. Please note, anyone can contact the NPS for an update on their project but the NPS has requested any other correspondence from preparers be made through the SHPO.⁶ Once the SHPO is notified of a decision, program staff will contact the preparer with the NPS's decision. If successfully listed, a certificate signed by the governor is mailed from the SHPO to the property owner (if a single site nomination) or to the mayor (if a district nomination). The entire National Register process, from the first submission to listing, can take anywhere from six months to a year on average.

⁵ Because nominations are generally only [scheduled](#) for a MOACHP meeting if they are considered "NPS ready," the SHPO will forward a Council-approved nomination to the NPS, even if a post-MOACHP final is not submitted. However, because Council and remaining SHPO comments may include guidance that would further strengthen the nomination, it is strongly encouraged to submit a final version for any nomination approved at a MOACHP meeting.

⁶ Per NPS email from Barbara Wyatt to NR Coordinators, 11/20/15

Diagram of Nomination Process



Missouri Standards for National Register Nomination Submissions

Every SHPO must minimally maintain standards for National Register nominations as outlined by the National Park Service, but each SHPO may institute additional standards to meet their individual needs and priorities (36 CFR Part 60.6).

The SHPO will accept a draft nomination at any time, but in order for a nomination to be considered at a particular MOACHP meeting, a “complete” submission must be turned in by a designated due date. This means the SHPO has the materials necessary to provide a thorough review of the nomination in time for the appointed meeting. While it does not guarantee a place on the MOACHP meeting agenda, submitting a complete nomination is the first step in the official review process. For first time preparers, it may make sense to turn in early drafts for SHPO input. Complete submissions take priority; however, staff always welcomes early drafts, especially if a prior Eligibility Assessment has been completed.

Packaging

The National Register submission process is entirely digital at the Missouri SHPO; hard copy materials are not accepted. Nominations and associated materials may be submitted to staff via an online file sharing service. Contact staff for instructions.

Additionally, nomination materials may be submitted on disc (USB drives are not accepted). When submitting a nomination, **please send everything in one package**. Mailing the submission in piecemeal can result in lost or misplaced materials. **Do not e-mail the nomination or any other materials to the reviewer unless otherwise directed.**

To be considered “complete” a submission must include the following components:

Initial Submission

- A complete National Register nomination form in Word-2016 readable format (<http://www.dnr.mo.gov/shpo/docs/10-900-MoRevisedNRforms.doc>)
- A complete cover document or “jacket”
- A complete Section 7 with a summary, setting, clear exterior description, interior description (if a single site nomination) and integrity subsections
- A complete Section 8 with a summary, concise historic context, appropriate comparisons, a clear argument for significance and a conclusion
- Sources are appropriately cited with footnotes (if there are issues with formatting contact the SHPO)
- A complete bibliography (sources for footnotes and figures must be included)
- Text is original (does not contain cut and pasted material, see chapter on [Writing](#))
- Verbal Boundary Description and Justification sections are complete and accurate
- A list of figures and photos (if figures are embedded note page numbers in figure log)
- A site plan or district map showing contributing and non-contributing resources
- A photo map showing the number, location and direction from which each photograph was taken
- A map of the nominated resource(s) including latitude/longitude coordinates, a North arrow, and a scale (this map can be combined with the photo map only if it does not appear cluttered)
- Current floor plans of at least the first floor (single site building nominations only. Please note additional floor plans of other floors may be required depending on where significant activities took place)
- Digital photos in color, saved in TIF format and labeled per NPS standards (“MO_County_full name of nomination_0001” etc.). Photos must be taken within 12 months of a potential MOACHP meeting
- The nominations may be submitted electronically. Contact staff for file sharing instructions. Otherwise the nominations may be submitted on disc (do not email submission materials). The MO SHPO does not accept hard copy National Register products
- See information below regarding requirements for district nominations

Due by the Revision Deadline

- Exhibit A “Property Owners Sheet”, a list of property owners obtained from either official land records or tax records no more than 90 days before the MOACHP meeting (for single site nominations, a physical address is also needed for mailing of the National Register certificate once listed; P.O. boxes are not acceptable). See [Appendix III](#) for a copy of Exhibit A.
 - For districts, owner information will be provided in an Excel sheet following specified instructions. The Excel sheet and associated instructions will be provided to preparers of district nominations with comments on the first draft. See [Appendix V](#) of this document for a copy of the instructions and [Appendix VI](#) for a look at the Excel template.

- Exhibit B “Elected Officials Sheet”: Include the contact information for the Presiding Commissioner of the County Commission and the Mayor if the property is located in a city or town. Provide just the County Commission information if the property is in a rural or unincorporated area. See [Appendix IV](#) for a copy of Exhibit B.

These standards can also be found on the SHPO’s website:

<https://mostateparks.com/page/85656/nominations-national-register>

Later chapters in this document provide guidance on each of these components. A component is considered complete when it is filled out in full. As an example, a draft nomination that contains a Section 7 or 8 that is bullet pointed or appears to be a compilation of rough notes will not be accepted. Likewise, if citations are missing from the narrative, it will also be considered incomplete. If there are any questions about the submission standards, contact the SHPO well before the deadline date.

If a nomination is received by the deadline and is not complete, it will not be reviewed for that MOACHP meeting cycle. The preparer will be contacted and may submit nomination materials for a later MOACHP meeting. To prevent this outcome, preparers are encouraged to submit nominations before the deadline. If there are missing materials, the preparer will have the opportunity to submit them by the due date. There is also a checklist (see [Appendix I](#)) that can be utilized to make sure all of the materials are together.

In cases where there is a complete nomination, but the eligibility of a nominated property is not clear and cannot be easily addressed, the nomination will not be placed on the MOACHP agenda. An explanation as to why the nomination is not being scheduled will be provided to the preparer pursuant to 36 CFR Part 60.11(c). This is discussed in further detail below. To avoid this outcome, the SHPO encourages the submission of an Eligibility Assessment **before** a nomination is prepared (see [next chapter](#)).

Requirements for District Nominations:

Properties can be listed individually in the National Register, or they can be nominated as part of a historic district. The National Park Service defines a district as a geographically definable area, urban or rural, possessing a significant concentration, linkage, or continuity of sites, buildings, structures or objects united by past events or aesthetically by plan or physical development.⁷

More information on architectural survey can be found on our website:

<https://mostateparks.com/page/86111/survey>

⁷ NPS Bulletin 15, page 5. Definition from *Washington State National Register District Guide*, pg. 1

For Districts Under 75 Properties with No Prior Survey (survey must be current/accurate)

- Color images in digital format of each resource (and secondary resources as appropriate) not captured in the formal tiff images. Photos must be clear. Label the files by street address. Please submit images on disc (jpeg format preferred).

Images are needed of resources not captured by formal tiff images or prior surveys (must be on file at the SHPO) so staff can review the individual building descriptions in a nomination and evaluate their contributing status. The images do not have to be high quality but they must be clear enough to discern building materials and details (wood vs. vinyl siding for example). A photo showing more than one resource is permissible so long as each property is clearly identifiable and can be compared with the Section 7 description. For example, a long streetscape photo where only portions of the facades of the buildings are visible would not be acceptable, but a single image capturing the full facades of three buildings would be. Even if a survey is on file at the SHPO, additional images may be needed if there have been changes to the area since the survey was conducted. For example, if the survey notes a property has wood siding but the description in the nomination states it has vinyl siding, a new image is needed for review purposes. If more than 50% of the survey area has changed or if the survey did not account for all resources, resurvey is recommended. Do not forget to include images of structures, sites, and objects that are noted in the nomination. If all of the resources described herein are covered by tiff images or current survey data on file at the SHPO, additional images are not required.

Minimal Survey Requirements for Potential Districts with More Than 75 primary properties:⁸

If there is a previous survey on file with the SHPO

- Notify the SHPO 90 days before submitting the nomination
- Ensure the survey reflects what the area looks like today. Some older surveys only documented so-called “historic” properties at that time. Vacant lots, resources that lacked integrity or those outside of a proposed period of significance may not have been accounted for. These types of surveys, while helpful, do not provide an accurate sense of the built environment. For example, a 1985 survey may have only recorded historic buildings over 50 years old at the time. By that reasoning any resource built after 1935 was not recorded. Likewise National Register standards evolve over time. In 1985, a National Register nomination may not have had to account for vacant lots or parking lots like they do today. Finally, resources change over time. A neighborhood may have changed dramatically since the survey was conducted. **If a substantial portion⁹ of resources in a proposed National Register district are not accounted for and/or do not accurately reflect the district, resurvey is required.** If only a few¹⁰ properties have changed or were unaccounted for in the survey, submit color images of these resources (see requirements above for districts under 75 properties).

⁸ Note these are not the same as the professional requirements for Historic Preservation Fund (CLG Grants) funded surveys

⁹ As each case is unique, please contact the SHPO for further guidance.

¹⁰ As each case is unique, please contact the SHPO for further guidance.

- The survey must encompass the boundaries of the potential nominated district. If only a few properties were left out, include current images of the resources.
- Provide a map of the potential National Register boundary
- Provide a summary of the potential argument noting the level, area of significance, and period of significance of the proposed district

If no previous survey has been conducted

- Before the survey is completed, contact the SHPO for a survey number
- Prepare a SHPO-approved inventory form for each property that includes:¹¹
 - Property address
 - Construction date
 - Architectural style and/or type
 - Number and type of secondary resources (such as garages, sheds, gazebos, etc.)
 - Contributing status of both the primary resource and any secondary resources
 - Historic information (if appropriate)
 - Builder or architect (if known)
 - Brief architectural description
- Map showing the survey boundary, potential National Register boundary and the contributing status of each property. The map should be large enough in size so that SHPO reviewers have no issue verifying its accuracy.
- A digital color photo of each property, secondary resources (as necessary), and streetscapes (photos must be at least 1600x1200 pixels and saved in .jpg format)
- A digital report with the findings that includes:
 - Potential argument and area of significance
 - Period of significance
 - Number of contributing and non-contributing properties
 - Boundary justification for the survey and potential National Register District¹²
- Survey materials are submitted to the SHPO in digital format on disc at least 90 days before a nomination is submitted.

If a previous survey has been conducted but is not on file with the SHPO

- A copy of the survey must be turned in 90 days before a nomination. See above information concerning the accuracy of survey materials.
- Provide a map of the potential National Register boundary
- Provide a summary of the potential argument noting the level, area of significance, and period of significance of the proposed district
- Survey materials are submitted to the SHPO in digital format on disc.

Link to SHPO architectural survey form: <https://mostateparks.com/sites/mostateparks/files/780-2125-f.pdf>

¹¹ Ensure survey information is accurate and uses consistent terminology.

¹² To help justify the National Register boundary, the survey boundary should often be slightly larger than the potential National Register district.

How does the SHPO decide what is scheduled for the MOACHP agenda?

Federal regulations state that, once a state review board approves a nomination, the SHPO shall submit the nomination to the NPS within 90 days (36 CFR 60.11 (e)). This means that, should the MOACHP approve a nomination, the SHPO must send it to the Keeper at the National Park Service, even if a final post-meeting draft does not come in. To avoid a potential rejection or return, the SHPO wants to ensure the MOACHP and the NPS reviews the strongest nomination possible. For this reason, nominations must be NPS-ready to be considered for a MOACHP agenda. NPS-ready means that a nomination may have minor technical errors but would stand up to NPS scrutiny as presented without a follow-up draft.

Appropriate documentation is a big factor in the decision making process. As noted above, a complete nomination is required before a nomination is considered for a potential meeting. The SHPO sometimes receives complete nominations that do not make a clear case for listing. For instance, a nomination may list a lot of historical facts instead of including an argument or any reason why the property is eligible (see chapter "[Section 8](#)"). Likewise a comparison to similar properties may be missing, making it difficult to support the argument for the level of significance. While a property's history is certainly important, there must also be a discussion on *why* the history is significant as it relates to the property. If this cannot be rectified by the second draft deadline, the nomination will likely not be scheduled for the upcoming MOACHP agenda.

First drafts of nominations must have enough information to determine National Register eligibility. If they do not, the nomination may not be considered for the associated MOACHP meeting. Likewise, a nomination may not be considered if staff comments on the first draft are so extensive that they could not reasonably be addressed by the revision deadline. In both of these cases, a revised draft fully addressing staff comments may be submitted by the initial submission deadline of the following MOACHP meeting.

On rare occasions, a complete nomination will contain a clear argument but the property simply is not eligible for listing in the SHPO's opinion. These are cases that no amount of time on the nomination would likely fix. Often, a lack of historic integrity is the culprit. As an example, a commercial building may have housed a very significant business to the community, but the building has a large addition, new windows and siding. No matter the argument, the historic integrity of the property has been compromised. In these instances, a nomination will not be scheduled. Please note, **the SHPO assesses a property as-is**. Even if there are plans to restore the property to its historic appearance, determinations of eligibility cannot be made based upon intentions. It is recommended to stay in contact with the SHPO when and if a rehabilitation project takes place.

Staff decides what is scheduled pursuant to 36 CFR Part 60.11(c), which states:

If the nomination form appears to be adequately documented and if the property appears to meet the National Register criteria for evaluation, the State Historic Preservation

Officer shall comply with the notification requirements in § 60.6 and schedule the property for presentation at the earliest possible State Review Board meeting. Scheduling shall be consistent with the State's established priorities for processing nominations. If the nomination form is adequately documented, but the property does not appear to meet National Register criteria for evaluation, the State Historic Preservation Officer need not process the nomination, unless so requested by the Keeper pursuant to § 60.12.

Decisions are made via staff consensus. Should a preparer disagree with the SHPO's decision to not schedule a nomination for a particular MOACHP meeting, they may appeal. The appeals process is outlined in [36 CFR Part 60.12](#). Depending on the circumstances, a preparer may also resubmit the nomination to the SHPO for consideration of a later MOACHP meeting date. For example, a revised draft may be submitted by the initial deadline for a later meeting when changing the area of significance or providing further documentation. However, if eligibility is a concern, or other routes have been exhausted, an appeal may be the only option left. Nominations are reviewed on a case-by-case basis; for more information please contact the SHPO.

APPROACHING THE NR PROCESS

There are several important items to take into consideration before beginning the National Register nomination process. Prior to submitting a National Register nomination submission, the SHPO recommends preparers consider the following...

Eligibility Assessments:

While not mandatory, the SHPO *strongly* recommends the submission of an Eligibility Assessment (EA) before the preparer completes a National Register nomination. The EA serves as a means to determine if a property is a good candidate for the National Register program. It consists of current photos and a simple form to record facts such as construction date, address, and a brief history of a historic resource. Upon receipt of the EA, the SHPO has 30 days to make a recommendation to the preparer. Staff will provide an opinion that the property appears to be eligible, ineligible, or more information is required to make a decision. Determinations are based on the National Register Criteria for Evaluation.

Eligibility Assessments also allow for the SHPO to provide advice for a potential National Register nomination. Most importantly, the EA process substantially reduces the possibility that a nominated resource will be found ineligible for listing after the lengthy nomination writing process, thus saving time for the preparer.

Please note an EA does not replace the nomination process. Even if the SHPO determines a property to be eligible, a complete National Register nomination must still be submitted. While submitting an EA is a helpful and highly recommended first step in determining if a property is a good fit for the National Register, a favorable determination at this stage *does not guarantee* National Register listing.

For more information on Eligibility Assessments, including access to the required forms and instructions on how to complete them, please visit the SHPO website at:

<https://mostateparks.com/page/85626/my-property-eligible-listing-national-register>

Significance and Integrity:

In order for a historic resource to qualify for listing in the National Register, it must be associated with an important historic context and possess integrity. Integrity is defined by the NPS as the ability of a resource to convey its historic significance. The National Register Bulletin 15, entitled “[How to Apply the National Register Criteria for Evaluation](#),” is an excellent resource for determining a resource’s area(s) of significance and integrity. Especially for novice preparers, a review of this bulletin should be a priority during the preliminary phases of the nomination process. See the chapter on completing [Section 8](#) for further discussion of significance.

Integrity¹³

In addition to a property possessing historic significance, it must also possess integrity to be eligible for listing in the National Register of Historic Places. There are seven components to consider when assessing a building's integrity: location, design, setting, materials, workmanship, feeling, and association.

ASSESSING INTEGRITY IN PROPERTIES

Integrity is based on significance: why, where, and when a property is important. Only after significance is fully established can you proceed to the issue of integrity.

The steps in assessing integrity are:

- Define the **essential physical features** that must be present for a property to represent its significance.
- Determine whether the **essential physical features are visible** enough to convey their significance.
- Determine whether the property needs to be **compared with similar properties**. And,
- Determine, based on the significance and essential physical features, **which aspects of integrity** are particularly vital to the property being nominated and if they are present.

Ultimately, the question of integrity is answered by whether or not the property retains the **identity** for which it is significant.

- **Location:** Is the resource still in its original location? If it has been moved, it is much more difficult to list.
- **Design:** This is the combination of elements that create the style, form, space, structure and plan of a resource. Significant non-historic alterations and additions are something to keep in mind while assessing integrity of design.
- **Setting:** Is the relationship between the resource and its natural and manmade surroundings still similar to the way it was during its period of significance?
- **Materials:** A property must still possess important building materials from its period of significance. For instance, vinyl siding placed on a 19th century home will negatively affect the integrity.
- **Workmanship:** Workmanship is the physical manifestation of the builders' or laborers' skill.
- **Feeling:** Feeling is an abstract aspect of integrity that does not have clear boundaries. When taking into consideration all of the building's features and setting as a whole, does it evoke feelings related to its historic significance? Would someone from the property's historic period, if transported in time to today, be able to recognize it?
- **Association:** Association is the direct link between an important historic event or person and a historic resource. Does the property still retain features that convey its historic association?

A property has integrity or it does not. There are not "levels" of integrity. Integrity is the **result** of the seven aspects mentioned above but, as each property is unique, there is no set

¹³ Image from page 45 of National Register Bulletin 15, "How to Apply the National Register Criteria for Evaluation", <http://www.nps.gov/nr/publications/bulletins/nrb15/>, accessed October, 2014.

formula for assessment. Some aspects may be more important than others depending on the resource. For example, the “setting” aspect for a farmstead under Criterion A: Agriculture will have a larger role than it would for a townhouse seeking significance for its style under Criterion C.

Common Issues with Integrity:

The following is a list of common issues the SHPO has encountered when evaluating integrity:

- Attempting to make a case for integrity based upon future plans or materials/features that may be intact but are currently obscured. The SHPO assesses properties **as they currently exist**. Character defining features must be visible from the exterior at the time of assessment. Uncovering a segment of modern siding to reveal historic material is generally not sufficient to comment on integrity. Enough of the historic material must be visible for the property to be considered contributing/eligible as it sits. The SHPO **cannot** comment on future actions such as removing modern materials or otherwise altering a building to “make” it eligible. The property owner assumes any risk of removal of non-historic materials or other alterations.
- Additions: Although less of an issue in district nominations, if an addition overwhelms a property, it can make it non-contributing. The NPS offers guidance on additions that may be useful: NPS White paper on additions:
http://www.nps.gov/Nr/publications/guidance/NR_workshop_3-11-09/White_paper_on_additions_4-09.doc
- Alterations are considered historic but are not within the period of significance. Integrity must correspond to the time in which the property was significant. For example, Carrara glass was added to a property in the 1930s, however, the period of significance only extends to 1915. Even though the Carrara glass was added well over fifty years ago, it is outside of the period of significance, thus it negatively impacts the integrity.
- Adding historic details: In an effort to compliment the historic feel of their main street, a business owner may add a decorative cornice and window surrounds to their otherwise plain two-story commercial block building. There is no historic evidence that the building ever had such decorative details. While it may make the building more attractive, this detailing creates a false sense of history. In some cases adding such detail can make a property ineligible for the National Register.
- Recreation vs. Restoration: Similar to the above case, a property owner adds historic detailing to their two part commercial block building but this time has proof those details were there in the past. If taken too far, this too could result in the property becoming ineligible due to the aspect of “materials” as the property becomes more of a recreation rather than an original historic resource. As overheard at a preservation conference *“Integrity can potentially be revealed but it rarely, if ever, can be added.”*
- Interiors: The interior spaces may not play as important a role for district or Criterion C nominations. However, for Criteria A and B nominations, significance is generally tied to

activities that took place inside the building, thus the retention of these spaces is often vital to making a case for significance. This generally boils down to floor plan. The retention of historic finishes is always a plus, but more importantly the space must be retained. For example, if a property is significant due to its function as a warehouse, retention of large open spaces where historic activities took place will be important. If that space was subdivided to serve as an office it may lack integrity, even if the exterior is unaltered. In other words, the interior no longer *feels* like a warehouse; its significant function is no longer readable. Current floor plans are crucial for Criterion A and B nominations and are a requirement for individual nominations regardless of the criteria selected.

Research:

National Register nominations are inherently research-heavy documents that require planning and gathering relevant source material. Research is necessary to determine a property's National Register eligibility and complete the nomination form. Since some nomination preparers are not trained historians or historic preservation consultants, the SHPO recommends utilizing the National Register Bulletin entitled "Researching a Historic Property" to facilitate the research process. Useful for all preparers, this document provides insight and recommendations for finding data repositories, acquiring specific types of sources relevant to the particular nomination and utilizing established historical research practices to extract meaningful information.

The "Researching a Historic Property" National Register Bulletin can be found at:
<https://www.nps.gov/subjects/nationalregister/upload/NRB39-Complete.pdf>

Some repositories that may provide information to the researcher are listed below:

- Local library or county historical society
- County tax assessors or recorder of deeds office
- Missouri SHPO (<https://mostateparks.com/shpo>)
- State Historical Society of Missouri (<http://shs.umsystem.edu/index.shtml>)
- Missouri State Archives (<http://www.sos.mo.gov/archives/>)
- Sanborn Fire Insurance Maps of Missouri (<https://dl.mospace.umsystem.edu/mu/islandora/object/mu%3A138690>)
- Missouri Historical Society (<http://www.mohistory.org/>)
- Library of Congress (<https://www.loc.gov/>)

Jacket

The Jacket, sometimes called the cover document, is the first 4-5 pages of a nomination and contains information regarding the property's address, preparer information and abbreviated information regarding structural, historical and geographic information.

Section 1: Name of Property

1. Name of Property	
Historic name	<u>Doe, John and Jane, House</u>
Other names/site number	<u>N/A</u>
Name of related Multiple Property Listing	<u>N/A</u>

Historic and other names should reflect the official or common name during the period of significance. If the property is named after a person, list the last name first. Example: "Bartlett, John R., House." When naming a historic district, be sure to use "traditional terms" for instance, "village, ranch, courthouse square, or townsite." If preferred, more general terms can be used, such as "historic district or archeological district."¹⁴ For example, "Long Ford Ferry Landing," "Cooperstown Historic Industrial District," or "Longswamp Townsite" are appropriate. Do not randomly make up a name. If having difficulty with this section, please contact the SHPO. If the **"Other names/site number"** field is not used, type "N/A" in the blank. If the Other Name is the preferred name, this can be noted on the line by adding "(preferred)" behind the name. **Name of related Multiple Property Listing** refers to a Multiple Property Document Form, which is a historical context that has been approved by the Park Service. See the chapter on Multiple Property Documentation Forms for more information. For a list of NPS approved MPDFs, please contact the SHPO. If the property does not fall under the parameters of one of these documents, mark "N/A" in the field.

Section 2: Location

2. Location			
Street & number	<u>555 Anon Street</u>	N/A	not for publication
City or town	<u>Jefferson City</u>	N/A	vicinity
State	<u>Missouri</u>	Code	<u>MO</u>
County	<u>Cole</u>	Code	<u>051</u>
Zip code	<u>65101</u>		

The **"Street & number"** should include the physical address of the property. Post office boxes should not be used. The tax assessor's office can often help identify the address of a property. If the property does not have an address, list its location as follows: "NE corner of Main and

¹⁴ National Register Bulletin 16A: *How to Complete the National Register Registration Form*. p 8.

Capital Streets” or “1 mile south of jct. Hill Road and HWY 73.” When listing the address for a smaller district use the exact addresses included or the blocks listed. Example: “125-205 1st St. and 405 Main St” or “800 Block W 10th Ave.” For larger districts, use the bounding streets and list the streets north, east, south and west. Example: “Roughly bounded by Green Lake, 1st, Main and 5th Streets.”

Mark the “**not for publication**” box with an ‘x’ if the location of the property needs to be kept confidential to protect it from vandalism or if the location is classified. This box is used most frequently for archaeological and defense properties. Otherwise, mark “N/A” in the box.

Mark the “**vicinity**” box with an ‘x’ if the property is rural in nature and not associated with a town or if the address is restricted. Otherwise, mark “N/A” in the box.

The “**code**” line refers to the three-digit number assigned to each county by the NPS. A key to the codes can be found in Appendix II of [NPS NR Bulletin 16A](#).

Sections 3 & 4: State/ Federal Agency Certification & National Park Service Certification

3. State/Federal Agency Certification	
<p>As the designated authority under the National Historic Preservation Act, as amended, I hereby certify that this ___ nomination ___ request for determination of eligibility meets the documentation standards for registering properties in the National Register of Historic Places and meets the procedural and professional requirements set forth in 36 CFR Part 60.</p> <p>In my opinion, the property ___ meets ___ does not meet the National Register Criteria. I recommend that this property be considered significant at the following level(s) of significance: ___ national ___ statewide ___ local</p> <p>Applicable National Register Criteria: ___ A ___ B ___ C ___ D</p>	
Signature of certifying official/Title <u>Missouri Department of Natural Resources</u> State or Federal agency/bureau or Tribal Government	Date
<p>In my opinion, the property ___ meets ___ does not meet the National Register criteria.</p>	
Signature of commenting official 	Date
Title _____ State or Federal agency/bureau or Tribal Government	
4. National Park Service Certification	
<p>I hereby certify that this property is:</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>___ entered in the National Register</p> <p>___ determined not eligible for the National Register</p> <p>___ <u>other</u> (explain:)</p> </div> <div style="width: 45%;"> <p>___ determined eligible for the National Register</p> <p>___ removed from the National Register</p> </div> </div>	
Signature of the Keeper	Date of Action

Section 5: Classification

This section is broken up into topics. The first two, “**Ownership of Property**” and “**Category of Property**”, are relatively self-explanatory and are described thoroughly in *Bulletin 16A*. If there are still questions after consulting the Bulletin, please contact the SHPO staff.

Common errors in this section include forgetting to account for vacant lots or parking lots. Appendix II of this document provides NPS guidance on this subject. Sites such as parks or designed landscapes are also easy to overlook and may include resources within them that must be individually counted. Please note that, although sites like empty lots, gardens, and parks must be individually described in the Section 7 description and accounted for on maps, they are only

included in the resource count if they contribute to a property. Do not count additions separately. If one can walk through portions of a property without going outside it usually is considered one building. The exception is if properties were historically separate and later connected; they can be counted separately but must all be within the nomination boundary. Small “connectors” may or may not impact the integrity of a property. For example, it is not uncommon in large cities to incorporate walkways between buildings. The NPS does not currently offer clear guidance on this issue, so it is strongly recommended to contact the SHPO for guidance. When counting resources, consult both current tax/property maps and historic maps from the period of significance, to determine how resources in the district should be counted. Page 17 of *Bulletin 16A* provides useful tips for counting resources. The resources noted in this field must match the resource counts noted in both the Section 7 and 8 summaries.

The last blank, “**Number of contributing resources previously listed on the National Register,**” is used for district nominations, amendments, or boundary changes where some resources may have been previously listed in the National Register. Simply indicate the number of previously listed resources in the blank. If there are listed properties, they must be noted at the beginning of the Section 7 narrative. It is recommended to do this via a table if the nomination is for a boundary increase or additional documentation. Said table would note resource type (building, structure, object, site) and contributing status for the previously listed resources. Please note that listed properties cannot be included in the contributing/noncontributing count in the field above. If no resources within the nomination have been previously listed, write “N/A” in the blank.

Section 6: Function or Use

6. Function or Use	
Historic Functions (Enter categories from instructions.)	Current Functions (Enter categories from instructions.)
DOMESTIC/single dwelling	VACANT/NOT IN USE

This section is used to catalogue the use of the resource(s) both in its present status and its historic application. For a complete list of categories and subcategories, see *Bulletin 16A, pages 18-23*. Under “Historic Functions” only enter functions associated with contributing resources. For “Current Functions” enter functions for both contributing and non-contributing resources. When listing the functions, be sure to include only one function use per line. Format the entries with the category followed by subcategory. Example: “Commerce/Trade: business” or “Religion:

religious facility.” Be consistent with formatting the entries and use the same formatting in Section 7 that is used for the blanks in Section 6. **Keep in mind, function or use will not necessarily be the same as the area of significance, noted in Section 8.** For instance, even though a church’s function may be “Religion: religious facility,” the likelihood of it being significant for “Religion” is quite rare. See *Bulletin 15: How to Apply the National Register Criteria* for more information.

Section 7: Description

7. Description	
Architectural Classification (Enter categories from instructions.) LATE VICTORIAN/Queen Anne _____ _____ _____ _____ _____	Materials (Enter categories from instructions.) foundation: STONE walls: WOOD: Weatherboard _____ roof: STONE: Slate other: _____ _____
<input checked="" type="checkbox"/> NARRATIVE DESCRIPTION ON CONTINUATION PAGES	

This section is used to catalogue a property’s architectural style and the building materials used. For a complete list of categories and subcategories see *Bulletin 16A, pages 24-27*. When completing the “**Architectural Classification**” and “**Materials**” fields, include only one item per line. Format the entries with the category and, if applicable, followed by a subcategory. Example: “Late 19th and 20th Century Revivals/ Tudor Revival” or “Modern Movement/ Moderne.” It may be appropriate to list only the category if the property is eclectic or non-descriptive in style. The same applies for listing materials. When completing the materials list, be sure to fill out each subheading: “foundation,” “walls” and “roof.” For a district list the major building materials visible throughout the district, beginning with the most prevalent. Use the same formatting in Section 7 that is used for the blanks in Section 6. See the [Section 7](#) chapter of this document for more information.

Finally, mark the “**Narrative description on continuation pages**” box with an “x.”

Section 8: Statement of Significance

This section has more variables than other sections of the Jacket and contains key information for establishing the eligibility of the nominated resources. The first part, “**Applicable National Register Criteria**,” includes a brief description of the four criteria that properties may be nominated under for listing on the National Register. For more in-depth information on criteria and areas of significance, see *Bulletin 15*. Under this subheading, one or more criteria (A, B, C or D) must be selected. This selection must match the criteria in the continuation sheets.

The list marked “**Criteria Considerations**” is used when the resource(s) being nominated would not normally be eligible for inclusion in the National Register, but because of a special consideration, is eligible for listing. Select all that apply to the nominated property. If none of the criteria considerations apply, leave this section blank. For districts, it is only necessary to select the options if the criteria considerations apply to the district as a whole or to a large part of the district. For more specific guidance about applying criteria considerations, see *Bulletin 15*.

8. Statement of Significance	
Applicable National Register Criteria <small>(Mark "x" in one or more boxes for the criteria qualifying the property for National Register listing.)</small>	Areas of Significance
<input type="checkbox"/> A Property is associated with events that have made a significant contribution to the broad patterns of our history.	Architecture _____ _____ _____
<input type="checkbox"/> B Property is associated with the lives of persons significant in our past.	_____ _____ _____
<input checked="" type="checkbox"/> C Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.	Period of Significance 1899 _____ _____
<input type="checkbox"/> D Property has yielded, or is likely to yield, information important in prehistory or history.	Significant Dates 1899 _____ _____
Criteria Considerations <small>(Mark "x" in all the boxes that apply.)</small>	Significant Person <small>(Complete only if Criterion B is marked above.)</small>
Property is:	N/A
<input type="checkbox"/> A Owned by a religious institution or used for religious purposes.	Cultural Affiliation N/A
<input type="checkbox"/> B removed from its original location.	_____ _____
<input type="checkbox"/> C a birthplace or grave.	Architect/Builder Smith, Bob
<input type="checkbox"/> D a cemetery.	_____ _____
<input type="checkbox"/> E a reconstructed building, object, or structure.	_____ _____
<input type="checkbox"/> F a commemorative property.	_____ _____
<input type="checkbox"/> G less than 50 years old or achieving significance within the past 50 years.	_____ _____
<input checked="" type="checkbox"/> STATEMENT OF SIGNIFICANCE ON CONTINUATION PAGES	

The second column of Section 8 begins with an area for listing “**Areas of Significance.**” A list of the categories and subcategories with brief descriptions of the areas of significance can be found in *Bulletin 16A, pages 38-41*. This section should match the narrative in the Section 8 continuation sheets.

Additional categories not published in National Register Bulletins 15 or 16A:

The NPS added additional subcategories under Ethnic Heritage and Social History in March 2021. The following table is from correspondence from the NPS to SHPOs. It is unclear when

NR Bulletin 16A or 15 will be updated to reflect this information but these subcategories are currently in effect.¹⁵

Current Area of Significance Category	Additional Subcategories
Ethnic Heritage-Asian	Cambodian
	Chinese
	Filipino
	Hmong
	Indian
	Indonesian
	Japanese
	Korean
	Laotian
	Thai
	Vietnamese
Ethnic Heritage-European	Albanian
	Austrian
	Basque
	Croatian
	Czech
	Danish
	Dutch
	English
	Finnish
	French
	German
	Greek
	Hungarian
	Irish
	Italian
	Lithuanian
	Luxembourgian
	Norwegian
	Polish
	Portuguese
	Russian
	Scandinavian
	Scottish
	Spanish
	Swedish
	Swiss
	Turkish

¹⁵ From “March 2021 National Register E-Blasts” emailed to SHPOs on March 26, 2021.

	Ukrainian
	Welsh
Ethnic Heritage-Hispanic	Caribbean
	Central American
	Cuban
	Dominican
	Mexican
	Puerto Rican
	South American
Ethnic Heritage-Pacific Islander	Guamian
	Chamorro
	Native Hawaiian
	Samoan
Social History	Civil Rights
	Disability History
	Labor History
	LGBTQ History
	Traditional Cultural History ¹⁶
	Women's History

“**Period of Significance**” is the next field of the jacket to consider. This will be a single year or a range of years in which the resource(s) being nominated were significant. Please note it is acceptable to have more than one period of significance, especially if there is more than one criterion selected. If the periods overlap, combine and enter them as one period of significance. The rationale behind the selection of the period of significance must be explained in the Section 8 summary and narrative and must match the dates on the jacket. The beginning of the period of significance of a building is often, but not always, the construction date. The end of the period of significance should reflect the end of the event for which the resource is significant. Remember, continued use does not equal significance. **Likewise, the period of significance cannot begin before the nominated resource was built or began serving the function for which it is considered significant.** See the chapter on [Section 8](#) for a more thorough discussion of how to select the period of significance.

This topic is further outlined in *Bulletin 16A*, page 42. If you still have questions after consulting these resources, contact the SHPO for further guidance.

¹⁶ Ibid -“It is anticipated that this subcategory [Traditional Cultural History] will be used to reflect the nomination of traditional cultural places or TCPs.”

The blank for “**Significant Dates**” is intended to note the year or years in which significant defining events occurred within the period of significance. See Chapter on Section 8 for more information. Please put one date per line or if there are no significant dates, mark “N/A” in the blank.

Remember, all significant dates must fall within the period of significance and must be explained in the Section 8 Summary and Narrative in the continuation sheets.

“**Significant Person**” should be marked “N/A,” unless the property is being nominated under Criterion B. If the nomination is listed under Criterion B, fill out the blank with the name of the significant person starting with the last name. Example: “Washington, John E.”

The line for “**Cultural Affiliation**” should be filled out with “N/A,” unless the resource is being listed under Criterion D. If the nomination is listed under Criterion D, use the commonly accepted term that applies to the cultural group.

Entries in the “**Architect/ Builder**” line should be entered last name first. If known, the architect or firm which designed the resource should be listed first. On the following line(s), list the builder(s). If the architect or builders are not known write “Unknown”, or if the field does not apply, mark “N/A” on the line.

The last box in Section 8 of the jacket is the “**Narrative description on continuation pages**” box. Mark it with an “x”.

Section 9: Major Bibliographic References

9. Major Bibliographical References	
Bibliography (Cite the books, articles, and other sources used in preparing this form.)	
Previous documentation on file (NPS):	Primary location of additional data:
<input type="checkbox"/> preliminary determination of individual listing (36 CFR 67 has been requested)	<input checked="" type="checkbox"/> State Historic Preservation Office
<input type="checkbox"/> previously listed in the National Register	<input type="checkbox"/> Other State agency
<input type="checkbox"/> previously determined eligible by the National Register	<input type="checkbox"/> Federal agency
<input type="checkbox"/> designated a National Historic Landmark	<input type="checkbox"/> Local government
<input type="checkbox"/> recorded by Historic American Buildings Survey # _____	<input type="checkbox"/> University
<input type="checkbox"/> recorded by Historic American Engineering Record # _____	<input type="checkbox"/> Other
<input type="checkbox"/> recorded by Historic American Landscape Survey # _____	Name of repository: _____
Historic Resources Survey Number (if assigned): _____	

Section 9 is composed of two check lists. The first, “**Previous documentation on file (NPS)**,” is used to note documentation that is on file at the National Park Service, like an application for federal tax credits, previous National Register and Landmarks designation, or a Historic American Building Survey (HABS). Leave this column blank if the options are not applicable. A common mistake is leaving this section blank when a Federal Part I tax credit application for the nominated property has been submitted to the National Park Service. In this case, the first option, “**preliminary determination of individual listing (36 CFR 67 has been requested)**”, should be marked. Do not mark this section if the additional data is not on file at the National Park

Service. For example, an architectural survey that is on file only at the SHPO would not be noted in this column. The second column, “**Primary location of additional data**”, is used to mark where data cited in the document can be found. The State Historic Preservation Office will be the facility that stores information regarding the nomination, so that line should always be marked with an “x”.

Section 10: Geographical Information

10. Geographical Data					
Acreage of Property <u>2.5 acres</u>					
Latitude/Longitude Coordinates					
Datum if other than WGS84: _____					
(enter coordinates to 6 decimal places)					
1	<u>38.579932</u>	<u>-92.162145</u>	3	Latitude: _____	Longitude: _____
	Latitude: _____	Longitude: _____		Latitude: _____	Longitude: _____
2	Latitude: _____	Longitude: _____	4	Latitude: _____	Longitude: _____
	Latitude: _____	Longitude: _____		Latitude: _____	Longitude: _____
UTM References					
(Place additional UTM references on a continuation sheet.)					
_____ NAD 1927 or _____ NAD 1983					
1	Zone _____	Easting _____	3	Zone _____	Easting _____
	Northing _____			Northing _____	
2	Zone _____	Easting _____	4	Zone _____	Easting _____
	Northing _____			Northing _____	
Verbal Boundary Description (On continuation sheet)					
Boundary Justification (On continuation sheet)					

The first blank in Section 10, “**Acreage of Property**,” should be completed to the nearest tenth of an acre. Example: “1.5 acres.” If the property is less than an acre, write “less than one acre” in the field.

The next two parts of Section 10 are for coordinates. The Missouri SHPO only accepts Longitude/Latitude Coordinates; leave the UTM reference blank. For more information regarding coordinate systems, please see the chapter on [maps](#). Districts less than 10 acres are only required to have one coordinate noted. For district boundaries larger than 10 acres, be sure to list the coordinates for each corner in the district. Only four blanks for coordinates are available in this section. If more than four points need to be recorded, list them on a continuation sheet under Section 10. Ensure all coordinates are correct, numbered or lettered, and correspond to points on the district boundary map. Ideally, there should be no more than 10 coordinates. If the nomination requires more coordinates, please contact the SHPO for guidance.

The last items required in this section are the “**Verbal Boundary Description**” and “**Boundary Justification**.” These should be completed on a continuation page for [Section 10](#) after the Section 9 Bibliography and are discussed further below.

Section 11: Form Prepared By

11. Form Prepared By			
name/title	Nancy Drew		
organization	Mystery Preservation, Inc.	date	December 7, 2016
street & number	555 Random Street	telephone	(555) 555-5555
city or town	Columbia	state	MO zip code 65203
e-mail	Nancy.Drew@mysterypreservation.com		

This is the section where the information about the preparer should go on the form. Please keep in mind that the physical and email addresses submitted in this section are the ones where correspondence will be sent. The default method of communication for SHPO-preparer communications is email. If this is not the preferred method, please notify the project's assigned SHPO reviewer. If there are multiple preparers, please note them on the "name/title" field if they will fit. Note which preparer is the primary contact. For example, "Nancy Drew (primary), John Doe, and Jane Smith". Nancy's contact information would be used to complete the rest item 11. If it is not possible to include the name of the authors on the name/title field, include the contact information for the primary contact and the rest can be noted on a continuation page. For example, "Nancy Drew (primary), see continuation page for full list." After the Section 10 verbal boundary description and justification continuation page, note the full list of preparers under a Section 11 heading.

Special note about draft nominations written by other authors: National Register nominations are public documents. So long as credit is given (please see the chapter on Writing for SHPO's policy on plagiarism), a nomination can be edited by others in certain circumstances. If a draft nomination was originally written by a different preparer, their names must stay on the nomination if any of the material from that draft is used. This most often occurs in cases where a nomination was never finalized/listed and another preparer is seeking to finish the nomination. In this case the original preparer's name and the year they worked on it would be noted in the "Name/Title" field. For example, Jill Adams started a nomination for a property in 2008 but dropped it because her client changed their mind. Years later a new owner bought the building and hires Vanessa Chan to finish the nomination in 2014. Since the original nomination contains useful information, Vanessa plans to keep it in the nomination. Thus the Name/Title field would read: "Jill Adams, original author, 2008: Vanessa Chan, current author, 2014." Vanessa's contact information would be noted on the organization and contact fields, as she is the current contact. This step is unnecessary if the nomination is completely re-written from scratch and does not use any of the original author's work.

Photos and Figures

Additional Documentation

Submit the following items with the completed form:

- **Maps:**
 - A **USGS map** (7.5 or 15 minute series) indicating the property's location.
 - A **Sketch map** for historic districts and properties having large acreage or numerous resources. Key all photographs to this map.
- **Continuation Sheets**
- **Photographs**
- **Owner Name and Contact Information**
- **Additional items:** (Check with the SHPO or FPO for any additional items.)

This section is a catch-all for visual documentation: owner information, photos and maps.

[Mapping](#) and [photo](#) standards are discussed in chapters further below.

Photographs

Submit clear and descriptive photographs. The size of each image must be 1600x1200 pixels (minimum), 3000x2000 preferred, at 300 ppi (pixels per inch) or larger. Key all photographs to the sketch map. Each photograph must be numbered and that number must correspond to the photograph number on the photo log. For simplicity, the name of the photographer, photo date, etc. may be listed once on the photograph log and doesn't need to be labeled on every photograph.

Photo Log:

Name of Property: Doe, John and Jane, House

City or Vicinity: Jefferson City

County: Cole State: Missouri

Photographer: Nancy Drew

Date

Photographed: November 30, 2016

Description of Photograph(s) and number, include description of view indicating direction of camera:

1 of 10: Primary Elevation of Doe House. View N.

2 of 10: Detail of Entrance. View N.

...

Please fill out the “**Photo Log**” section completely. Immediately following the information fields is a sentence that calls for the “description of photographs and number.” This list should be typed in the blank space following the photo log block. The log should include the photo number, identification of photo composition and direction the photo was taken. The sequence of photos in the photo log should match the labels on the photographs and any digital images. For more information about labeling photos and the SHPO photo standards, see the chapter on [photography](#). Any photo mentioned in the log should be referenced somewhere in the nomination (usually Section 7). If it cannot be referenced in the narrative, the photo is likely not needed.

Examples: 1 of 5: East Elevation of McKay House. View N
7 of 10: West side 500 block of 25th Street. View SW.

Figure Log:

Include figures on continuation pages at the end of the nomination.

Figure 1. Context Map. Source: Google Maps, 2016.

Figure 2. Current Floor Plans. Source: Nancy Drew, 2016.

Figure 3. Historic Floor Plans. Source: Bob Smith, architectural drawings, 1899.

...

Following the Photo Log is the “**Figure Log**,” which should be completed in the same way as the Photo Log. Figures should include a site plan, photo map, current floor plans for single site nominations or a district map, and any other images that may assist in illustrating points from the nomination, such as historic photos. These can be embedded in the text or included on continuation pages after Section 10 (or Section 11 if applicable) of the nomination in a section called “Figures.” Please remember, when determining the best method of inclusion (embedded or on continuation pages), the figures should be clear and sized appropriately so that important details can be discerned but not so large as to unreasonably increase the file size of the entire document.¹⁷ If figures are embedded, they should be formatted with text wrapping the image, sized to fit within the margin, and captioned to correspond to the Figures Log. Figures should be numbered, included in the log, and placed in the narrative in the order they are referenced in the text. Additionally, if embedding figures, list the page of the nomination that the figure is embedded on in the Figures Log. Be sure to include in the figure caption **and** in the bibliography a citation for the source used for a figure. (Example caption: “Figure 5: Carriage house c.1890. Missouri Historical Society. Barrett Collection.”)

HEADINGS:

United States Department of the Interior NPS Form 10-900		National Park Service / National Register of Historic Places Registration Form OMB No. 1024-0018
Doe, John and Jane, House Name of Property		Cole County, Missouri County and State
5. Classification		
Ownership of Property (Check as many boxes as apply.)	Category of Property (Check only one box.)	Number of Resources within Property (Do not include previously listed resources in the count.)

The headings on the Jacket begin on page 2 above Section 5: Classification. For “**Name of the Property**” use the historic or preferred name written in Section 1 of the Jacket. If the name is especially long, it may be necessary to use an edited version. Be sure to use the name consistently in the headings. For the “**County and State**” field, write out the name of the county

¹⁷Circumstances may vary depending on the project but, ideally, a National Register nomination Word document would be 25 MB or less. This recommendation is simply guidance; neither the NPS nor the Missouri SHPO has a requirement concerning document size

and the state. For example, “Ralls County, Missouri” would be the correct way to complete this field instead of “Ralls Co. MO”.

NPS Form 10-900 United States Department of the Interior National Park Service		OMB No. 1024-001
National Register of Historic Places Continuation Sheet		
Section number <u>7</u> Page <u>1</u>		
		<div><div>Doe, John and Jane, House</div><div>Name of Property</div><div>Cole County, Missouri</div><div>County and State</div><div>N/A</div><div>Name of multiple listing (if applicable)</div></div>

The headings on the continuation pages begin on Section 7 page 1. As with the jacket headings make sure the **“Name of Property”** matches the jacket and the other headings, and the **“County and State”** field is completely written out. If using a Multiple Property Document Form (MPDF) note the name of the MPDF in the **“Name of multiple listing (if applicable)”** field. Make sure it matches the name of the MPDF in Section 1 of the jacket. If the nomination is not utilizing a MPDF write “N/A” in the field.

Starting on page 1 of Section 7 the page numbers must be continuous throughout the nomination. Do not start the page numbers over in Section 8. The most common error with the headings is the section number staying fixed between sections. This problem is greatly reduced if using the form available on the Missouri SHPO website, however, if this issue occurs, please contact the SHPO office for assistance.

Section 7

This section of the guide will cover a few of the basics on completing Section 7 and discuss some of the issues that are frequently encountered during nomination review. This chapter focuses on nominations written for single properties or districts comprised of buildings, as these are the most common type of nomination in Missouri. **Section 7 must include a summary and the following subsections: setting; exterior description** (for all sides of the property if an individual nomination or individual primary façade descriptions for a district); **interior description** (for individually nominated resources); and **integrity**. Please note, nominations for other property types, such as structures, objects, and sites, must also be thoroughly described in Section 7 and should contain the following subsections: Summary, Setting, Resource Description, and Integrity. Contact the SHPO for good examples and/or further guidance on nominating said property types.

Summary

Ensure that the Section 7 Summary contains:

- Address (include city, county, and state)
- A summary of the character-defining features of the resource in addition to general attributes such as cladding, number of stories, roof pitch, and plan shape for single property nominations. For districts, this may include the type, styles, and typical construction dates of resources within the nominated boundary.
- A list of significant features or spaces. These are features that directly relate to the area of significance. Interior spaces and/or layout should be considered for Criteria A, B, and some justifications under Criterion C. For example, open interior spaces would be important for a factory nominated under Criterion A in relation to manufacturing. These open spaces are likewise a character-defining feature under Criterion C: Architecture if said factory is also a significant example of the daylight factory property type. Regardless of the area of significance, exterior features of some kind are typically considered significant such as fenestration patterns, form, cladding, etc. Specific exterior characteristics can also be significant under a Criterion C justification related to style. A mansard roof will be an important feature for a property that is eligible because it is an excellent example of the Second Empire style.
- The date(s) of construction or, for a district, the period of construction
- Number of contributing and non-contributing buildings, structures, objects and sites. For single site nominations, clarify what secondary resources are by name (one non-contributing building: a modern garage). The totals should match Section 5 of the jacket
- Dates of major alterations
- A statement about integrity

Setting

After the summary, **for both district and single site nominations**, include a subsection about the property or district's environment under a subheading titled "Setting". Note the contextual location (northwest part of town, for example) and describe the surrounding area outside of the boundary. Is it rural, residential, industrial, or commercial? Does the area contain a lot of modern infill or vacant lots? Has it remained stable over time? Also describe the setting within the boundary. For single property nominations consider the following questions: If there are outbuildings, what is the spatial relationship to the primary resource? What is the topography like? Is it a grassy lawn or a designed landscape? Does it include a paved parking lot and/or driveway? Is there a fence or a ditch? Does it include public works like sidewalks, curbing, retaining walls, or any other resource at the periphery of the boundary? Is the sidewalk historic? For districts, what is the typical setback? Are there lawns, parks, parking lots, and/or sidewalks? These questions are extremely important when considering a property or district's context, integrity, and boundary. They are especially important when considering the resource count. For example, a school's paved playground may be counted as a contributing structure or, if it's unpaved, a contributing site. Even for features that are too small to include in the resource count, it is useful to note if they appear to be historic or not. These could include drinking fountains or fencing within a park. Please reference the figure for the contextual map (required for all nominations) along with any photos that may help illustrate the property's setting.

Architectural Descriptions

The architectural description is the most important component of Section 7; a clear and logical description of the building's interior and exterior is paramount. National Register Bulletin 16A does an excellent job explaining the architectural description writing process and guidelines for describing properties. However, the information below is designed to supplement the bulletin and provide suggestions to address common issues.

- Start with a brief overall description of the resource. Do not forget basic details like the number of stories, exterior cladding, roof and plan shape.
- The in-depth description should follow a consistent approach, such as describing a building's exterior one elevation at a time, one floor at a time and from left to right. For single site nominations, it's recommended a subsection be included for each elevation.
- A good architectural description will transition seamlessly throughout and be easy to follow.
- Photographs **must** be tied into the architectural description throughout Section 7. For example, if a feature being described is visible in a photograph, note that photo in parentheses in the text: "(Photo 1)".
- While writing, ask "Would the description provided be sufficient for someone to identify that building on the block without seeing any photographs?"

- Differentiate between historic and non-historic features. Architectural descriptions must include discussion of any changes to the building, such as additions or alterations, and when the changes occurred.
- When describing windows, it is important to note the configuration, identify the type, division, construction material, number, location, and if they are original, historic, or replacement.
- Every resource noted in Section 5 of the jacket must be noted in the Section 7 summary **and** described with its own subheading in the Section 7 narrative. This includes any non-contributing properties. See the “District” subsection below for more information about subheadings and what information to include in the description.
- In addition to the Section 7 Summary, ensure significant spaces and features are discussed in the narrative. These are features that are directly tied to the area of significance. Further examples to those noted above, half-timbering could be a significant feature for a property that is eligible because it is an excellent example of Tudor Revival architecture. As noted, interior spaces tend to be of higher importance in Criterion A areas of significance. For example, a lab could be a significant space for a building that is nominated under Criterion A: Science. Likewise, an office where a significant person did their work could be an important space for a Criterion B justification. Circulation spaces such as corridors could be important feature for a property type justification.
- See chapter related to the [Jacket](#) about counting resources.

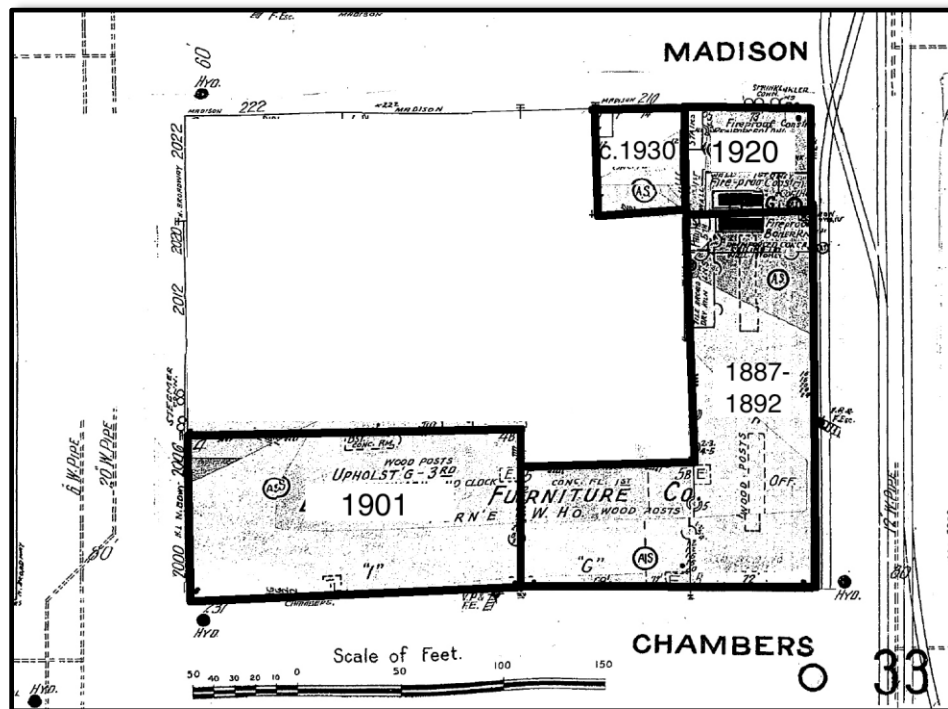
Interior Description and Floor Plans

The interior architectural description should utilize the same logic and system as the exterior description. Since current floor plans are required for single building nominations, these should be tied into the narrative in the same way as the photographs for the exterior architectural description.

- Floor plans are generally not required for district nominations.
- For individual building nominations, **current** floor plans are required for at least the main level of the property; however, additional plans may be needed depending on where significant activities took place. If significant activities took place on more than one floor, floor plans of additional levels must be submitted.
- Floor plans are also typically used to key in the photos. For more information, see the Photo Maps section for an example.
- If available, historic floor plans are extremely helpful to include for comparison purposes if they are clear. However, they may only be used as the “current floor plan” if they accurately reflect the property as it sits today. In these instances add a note that the floor plan is accurate in the figure caption.

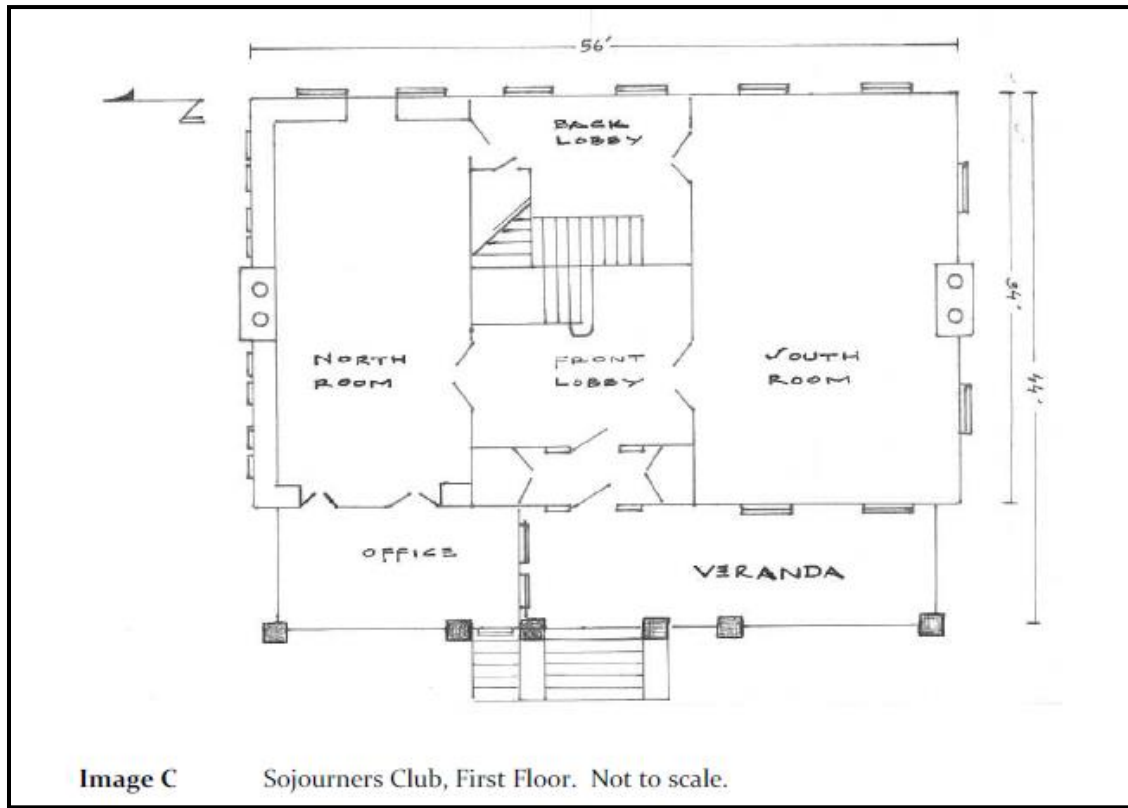
- Identify additions by date in a figure (see example below), floor plan, or the site map (additional example in the [mapping](#) chapter)
- Hand drawn floor plans are acceptable, provided that they are neatly drawn.
- Include a directional arrow and a scale, or note if the plans are not to scale.
- They must be clear and easy to read.
- Do not forget to tie floor plans into the Section 7 Interior Description

Example of a Figure Showing Location and Dates of Additions¹⁸



¹⁸Screenshot from Allen, Michael. "Standard Stamping Company Factory", National Register Nomination, 2020.

Floor Plan Example¹⁹



Section 7 Single Building Examples

The following nominations contain good Section 7 examples. They can be viewed by visiting the corresponding links.

The Perry County Courthouse in Perryville, Perry County:

<https://mostateparks.com/sites/mostateparks/files/Perry%20Co.%20Courthouse.pdf>

The Buchanan, Lucius P. Residence in Joplin, Jasper County:

<https://mostateparks.com/page/84686/jasper-county-national-register-listings>

¹⁹ Screenshot from Woodcox, Cole. "Sojourners Club", National Register Nomination, 2014.

Districts

Individual Resource Description Requirements for Districts

Organize the properties by street alphabetically in numerical order, smallest number to largest. Numbered streets would come first. If there is a direction associated with the street name (North, South, East, West) it would be organized alphabetically **within** that street. For example 100 E 6th would come before 100 W 6th, likewise N Short Ave addresses would come before S Short Ave addresses.

Section 7 of district nominations **must** contain a heading for each resource in the district. Do not forget to account for structures, sites, and objects that are included in the resource count, as well as “non-contributing” sites (described but not counted, see below for more information). The heading will contain:

- ID number for each resource in the district boundary (1., 2., 3., etc.). This is very helpful for finding specific properties in large district nominations.
- Street address
- Contributing or non-contributing status. In the header, put “Contributing”, “Non-Contributing”, or “Previously Listed” for all resources counted in the jacket.
- Date of construction
- If applicable, include the name of the property in the header if it has a specific name.
- The area below this heading will then contain the architectural description. See example below.
 - If a building or outbuilding is non-contributing in a district nomination, the description for that resource should state why that building is non-contributing. For instance, was it recently built or does it have integrity issues?
 - Double check that the contributing status for properties on the district map matches the narrative of Section 7 and corresponds with Section 5 of the jacket.

Examples for District Nomination Section²⁰

4 Regent Avenue, Regent Avenue Bridge; 1917; contributing structure

Style/form: Reinforced concrete open spandrel arch bridge

Photograph: 22 *Builder:* Western Bridge Co.

The Regent Avenue Bridge is a reinforced concrete, open spandrel arch bridge, featuring pierced spandrel walls with no fill materials. The simple span bridge has a deck travel surface above the single arch featuring a spandrel column on either side of the arch and concrete abutments. The concrete railing has square posts with a railing above a balustrade with pierced openings. By eliminating the walls and fill material inside, the bridge was viewed less expensive to construct, and was considered more aesthetically pleasing as well.⁷ On the interior of the southwest corner post is a bronze plaque with the following inscription: “Western Bridge Co.; Harrisonville, Mo.; 1917; W.C. Patton; City Engineer.” It spans the Fishing River at the east end of Regent Avenue.

5 507 Elms Boulevard; Reed Realty & Insurance Building; c. 1955; contributing building

Property Type: Commercial building

Photograph: 13

This one-story commercial building with brick and stone veneer has a nearly square plan and low-pitched hip roof. Located on a corner lot, it has two “primary” elevations – north and west – with a recessed, angled entry door on the northwest corner. This wood entry door (possibly historic) has a single large glass sash with simple wood frame. There are two recessed metal historic windows on the west elevation. Both are large rectangular windows with a large central sash flanked by narrow 1/1 windows on either side. A solid panel door (not historic) is at the south end of this elevation. The north elevation also has two metal windows; one is identical to those on the west, while the other has paired 1/1 windows. These windows are smaller than typically found on commercial buildings, and are more representative of post-World War II residential forms. There are three windows on the south elevation: one large window identical to those on the west, a smaller fixed sash window, and a tall 1/1 window. Another wood door is east of these windows. The west elevation has red brick veneer with a lower band of thin, horizontal red stone veneer beneath the window sill. The north elevation has brick veneer above the windows lintels, and a light on the west elevation, and a light stone veneer on the remainder of the wall. This same light stone veneer covers the entire south elevation. It is little altered on the exterior.

557. 4512 TENNESSEE AV (1901)

1C/INC

Property Type from MPDF: Shotgun House

Number of stories: 1

Builder: Segbers, Gerhard

Structural system: Load-bearing brick

This dwelling has a brick façade; it is painted red, with the exception of the upper section of the prominent left bay (which is red brick). The building has a side door at the right (south) elevation; there is an entrance at the rear of that elevation. The porch is a concrete replacement with imitation stone veneer over the base and metal uprights. At the façade, two segmental arched window openings are fitted with replacement 1/1 windows under fiberglass awnings. The cornice is corbelled brick. The front parapet wall is defined by end blocks. The foundation is limestone.

Ancillary Building: The metal carport is noncontributing because it was constructed after the period of significance.

²⁰ Sources for Examples: Upper: Wolfenbarger, Deon. “The Elm Historic District”, Clay County, National Register of Historic Places Nomination Form, 2014. p 8.

Lower: Josse, Lynn. “Dutchtown South Historic District”, St. Louis [Independent City], National Register of Historic Places Nomination Form, 2015. p 152

Following page: Staff example

A special note about describing a site

Contributing sites, such as a designed landscape, would be included in the resource count in the jacket and would have an individual description. However, due to the way the NPS counts resources (NR Bulletin 16A page 17), so called “non-contributing” sites must be described but are not included in the resource count. In this case note that it is “(described but not counted)” as pictured in the example below. Other guidance related to describing a site can be found in NR Bulletins 18 and 30 for designed and rural historic landscapes respectively.

21. 106-108 Maple St. **Non-contributing Site** (described but not counted)

Vacant Lot (2012)

Photo: 7

This grassy vacant lot was once occupied by a two-part commercial block building (constructed circa 1905) that was demolished in 2012. It remains undeveloped and does not contribute to the historic context of the district.

Integrity

To adequately cover the topic of integrity, Section 7 should have its own “Integrity” subsection where all seven aspects of integrity are discussed. Wherever a resource’s integrity has been compromised, it must be stated. While there may be different variances in the aspects that result in historic integrity, there are no levels of integrity; a resource either possesses it or it does not. See the chapter “How to Approach the NR Process” for further discussion of integrity.

Resource-Specific Nominations

It is important to note that some property types necessitate a different approach when writing a National Register nomination, especially when it comes to counting resources and mapping. For example, landscape nominations have unique mapping and description requirements. The NPS provides several bulletins that offer technical assistance when completing a nomination form. This includes, but is not limited to, guidance for battlefields, properties related to significant persons, cemeteries, designed landscapes, rural landscapes, and mining properties.

Link to NPS Bulletins: <https://www.nps.gov/subjects/nationalregister/publications.htm>

Section 8

Section 8 is often considered the most important section of a nomination. It describes why a property is eligible for the National Register and provides a history by which to evaluate its significance. This section has three main parts: the summary, narrative, and conclusion.

Summary:

When revisiting a nomination, the Section 8 Summary is typically the go-to source. It contains the main points about the nominated property or district. The summary should include the name of the property, its location (address, city, county, state), the criteria and area of significance²¹, the level of significance (local, state, national), the period of significance and a justification for it. Significant dates and criteria considerations will also be discussed in this section. Be sure the information on the jacket is consistent with information provided here. If the nomination is using a Multiple Property Document Form ([MPDF](#)), please include it in the summary noting what context (Section E) and property type (Section F) the nomination is utilizing from the MPDF. The summary will include the concise reason why a property is eligible. In most cases it will be less than a page in length. Consider this a kind of outline (in paragraph form) of what you will elaborate on in the rest of Section 8. The summary from the *Will Mayfield College Campus* nomination provides a good example of a strong Section 8 Summary.²²

Summary

The Will Mayfield College Campus, 207 Mayfield Dr., Marble Hill, Bollinger County, Missouri is locally significant under National Register of Historic Places Criteria A in the area of EDUCATION. Established in 1878 by Drs. William H. Mayfield and H.J. Smith, the private high school/preparatory school and junior college serviced Bollinger and surrounding counties. The school emphasized academic courses for high school students, religious education, and teacher training. The two buildings on campus include the earliest purpose-built college building (Administration Building) initially constructed in 1884. Attendance at the college peaked in the 1920s, encouraged by a building campaign that culminated in the construction of the Arts & Science Building (1924-27) and additions to the Administration Building (1909 and 1924-25). Architect L. Baylor Pendleton was responsible for the design of the Arts & Science Building and the 1920s additions to the original campus building. These buildings represent the full spectrum of the school's educational influence as a rural college. The period of significance is 1884 to 1934, the date of construction of the Administration Building through the year the school closed its doors.

²¹ New areas of significance subcategories were added by the NPS in March of 2021. They are discussed in “Jacket” chapter [above](#).

²² Example Source: Patterson, Tiffany. “Mayfield, Will College Campus” Bollinger County, Missouri, National Register of Historic Places Nomination Form, 2013. p. 4

Narrative:

The narrative provides the historic information by which to evaluate the significance of a property and an argument as to why the property is eligible. This generally begins with a history of the property location. For a district, the narrative will provide a discussion on the development of the area within the boundary, including a brief justification of the boundary itself (a formal boundary justification will be included later in [Section 10](#)).

Although there will be exceptions, in general, the history and context in Section 8 should be in chronological order. Avoid jumping around the timeline as it can create confusion for the reader.

Documentation

When approaching this section, take care to be concise but thorough with documentation. For instance, if nominating a commercial property in a small town, a brief history of the town in relation to how the nominated property came to be established would be appropriate. An in-depth discussion on the flour mill down the street or a lengthy biographical subsection about the founding fathers would not be relevant. Keep the period of significance in mind. If the area of significance is Commerce with a period of significance of 1920 to 1945 and the town was established in 1870, it is not necessary to include pre-settlement information. What is needed is an understanding of the commercial history of the community. Some information before the period of significance is necessary to set the stage, but this generally falls within a 10-20 year period depending upon the argument. The history of the property should stay as specific to the nominated building(s) as possible. When providing comments to a National Register preparer, staff often cautions against “chasing white rabbits” (see [General Tips](#)) or pursuing areas of historic information that are not pertinent to the eligibility of a building. Including a lot of genealogical information is a prime example of this.

Providing too little information is just as detrimental. Does the narrative provide enough context so someone not familiar with the subject has a clear understanding of why the building or district is important? Simply stating a district represents a change in a community’s development patterns by itself is not enough to make a case for listing. This statement must be supported via a discussion on the community’s growth.

The focus of a nomination’s historic context will be within the period of significance. That said it is a good idea to briefly note a property’s history after the period of significance as this helps justify the selection of the period. The period of significance and significant dates are discussed in more detail below. While it is acceptable to note present or future plans of a nominated property, it’s important to keep this information brief so as not to distract the reader as to why the property is National Register eligible. Future plans may fall through and, as stated in a [previous chapter](#), properties are assessed as they currently sit.

Subsections

It's strongly suggested that each area of significance under which a district or property is nominated have its own subsection. This is a good way to help focus the document. For example, the narrative may have a subsection for an architect or builder for a Criterion C Architecture nomination. Again, keep biographical information brief. In the case of an architect, what is needed is information about their work to understand the significance of the building in question as opposed to a lengthy life history.

Consistency

When writing the narrative, keep the information provided in the Section 8 Summary squarely in mind. **If it is mentioned in the summary, it should be further expanded upon in the narrative.** From time to time, staff sees information in a Section 8 Summary and it is never mentioned again. The information in the summary must be supported by the historic context and its significance argued for in the narrative. The context and argument are the key portions of the narrative and will take center stage. Since this is the case, they are described in more detail below.

Comparisons

Comparisons with similar properties are often necessary to make a case the property is significant within its selected level of significance (local, state, national). This is especially true for architectural significance, but most nominations will include a comparison of some sort regardless of criteria. In order to understand a resource's significance, it often has to be measured against other properties of similar design or purpose. For example, if a city has many Second Empire style homes, it must be explained why the specific Second Empire style property being nominated is significant for architecture. More than one example can be eligible for listing. However, the nomination must justify why the nominated property is a *significant* example. Comparisons are often a key player in making this argument. Make sure the comparisons are appropriate. Comparing an industrial structure to a residential home is not likely to provide a good basis for analysis. Conversely, relying too much on similar properties that were previously listed can be detrimental as each nomination provides an argument specific to that resource (see "[General Tips](#)" below for more information). A nominated district or property must stand on its own merit. Finally, avoid comparisons that are too narrow in scope. If a historic laundry business is nominated under Criterion C because it is a great local example of Streamline Moderne architecture, it would be appropriate to compare it to other commercial properties. Comparing it to other laundry businesses only, however, would be too narrow a context to evaluate significance.

Conclusion

Section 8 will conclude by reiterating the argument noted in the Summary paragraph and historic context discussed in the narrative. Conclusions are generally less than a few paragraphs but are a nice way to tie everything together. The Section 8 Conclusion from the *Sojourners Club*

nomination in Kirksville, Adair County, nominated under Criteria A and C in the areas of Social History and Architecture provides a nice synopsis of the nomination.²³

CONCLUSION

The Sojourners Club looks today much as it did when Irwin Dunbar designed it in 1916. Despite changes to the veranda, balustrade and roofing materials, this historic building provides one of the few local examples of Prairie School style. And it is a good example of early-twentieth century clubhouse architecture in Kirksville. Even though it was located near the middle of a block, the Sojourners Club was designed to be a freestanding building with narrow, open space around it; this necessitated visible detailing on all sides. Unlike the surrounding two-part commercial blocks with party walls and ornamentation restricted to one or two facades, the Sojourners Club exhibits distinguishing stylistic components on each of its four elevations.

What is more, the clubhouse has robust connections with local social history. The nominated property is associated with leading women, their philanthropies and aspects of the Women's Movement. It housed an organization focused on the development of women's intellectual, cultural, social, domestic and leadership skills and on civic engagement. For over seventy years the nominated property was a center of community activity -- used by this women's club and their principal philanthropy, Adair County's only lending library for its citizens.

As with the rest of the document, any source material in Section 8 must be properly cited with footnotes, figures and photos tied in as appropriate. All citations should be included in the bibliography. See the chapter on [writing](#) for more information.

Historic Context and Argument:

Two of the most common comments staff provides to preparers concerns the establishment of historic context and developing an argument. **Significance should never be considered self-evident. The boundary, period of significance, area of significance, and level of significance must all be argued for and supported in a nomination.**

For example, it is easy to say a property is eligible for listing because it is an excellent example of a particular architectural style. However, that claim must be justified via a discussion about the architectural style in question. What features are prominent in this particular style and how does the nominated property reflect these features? Where did the style come from historically? Is the nominated property typical for this sort of style? Are there any other properties of the

²³ Example Source: Woodcox, Cole. "Sojourners Club, Adair County, Missouri," National Register of Historic Places Nomination Form, 2014. p. 21

same style in the vicinity? How do they compare? These are a few of the questions that need to be considered when approaching the Section 8 narrative.

“The evaluation of properties for National Register eligibility involves an assessment of the significance of a property in terms of the history of the relevant geographical area, the history of associated historical themes or subjects, and within an historical and contemporary time frame—in other words, its *context*.”²⁴ Without this context, it’s almost impossible to establish the eligibility of a property.

In sum, every property has a history; an argument must be made as to why a property’s history is *significant*. Listing mere facts does not make an argument. There is the “so what” factor to consider. As the preparer, you may understand why a property is eligible but unless the nomination clearly demonstrates the reason for significance it may not convince or be clear to the audience. A good way to approach an argument is to keep the reason why a property is eligible in the foreground and avoid extraneous information, which can distract the reader. While there may be interesting factual tidbits, the focus must always be on the nominated property. Each line of reasoning for significance must be fully explored and defended, so take care when selecting an argument.

The NPS has several sources related to context that are highly recommended.

White Paper on Historic Context: https://www.nps.gov/nr/publications/guidance/NR_workshop_3-11-09/White_paper_on_historic_context_4-09.doc

Context, Context, Context, webinar: <http://www.nps.gov/nr/publications/guidance/pastwebinars.htm>

Period of Significance and Significant Dates:

The period of significance is the date, or range of dates, a property was *significant*.

Significance does not always translate to how long a property was used. Below are a couple of examples that provide guidance on how a period(s) of significance is selected.

Example One:

A high school may be significant under Criterion A for Education because it was the only facility where residents could receive a high school education between 1905 and 1915, when a second high school was built. The nominated school discontinued classes in 1950 and afterward the building was used as office space. The period of significance would begin in 1905 and extend to 1915, when the other high school was built. Even though the nominated property operated as an

²⁴ Wyatt, Barbara. *Components of a Historic Context: A National Register White Paper*. 04.09.09. <http://www.nps.gov/nr/publications/policy.htm#drafts> Accessed 12-11-2013.

educational institution up to 1950, it was only *significant* for a period of 10 years when it was the only institution in the community offering a high school curriculum.

Example Two:

A former hospital is being nominated under Criterion A for Medicine/Health. In 1885 a historic measure was passed in a community to build a hospital. Following this measure, architectural plans for the hospital were created the following year. Construction was complete by 1895 but due to legal issues the hospital was not put into use until 1900. From this period it served the community as a hospital until 1945 when a larger hospital was built on the other side of town. It continued to operate as a hospital until 1955 when it was decommissioned and converted into a private school.

As the hospital is being nominated for Criterion A: Medicine, its period of significance would be 1900-1945: the dates for which the building was locally significant and functioned as the only hospital in the area. Even though a “historic measure” was passed in 1885 it predates the construction of the building. The National Register of Historic Places nominates physical resources. Any planning or events that took place before that resource existed cannot be considered as part of the period of significance, although they should be discussed in the Section 8 narrative as part of the history. In this case, the property was built in 1895 but it was not put into use until 1900. For those five years it was not serving a significant function, thus why the period of significance would begin in 1900.

A property may have more than one period of significance. If in “Example Two” the hospital was a great local example of the Classical Revival style it may have an additional period of significance of 1895 under Criterion C: Architecture (correlating to when the hospital was constructed). Thus the periods of significance would be noted in the jacket as “1895; 1900-1945”.

Combine periods of significance only if they overlap. For instance, if the school from “Example One” (with the original period of significance of 1905-1915) became an African American elementary school in 1914 and served that function until 1950 the period of significance would be 1905-1950 under Criterion A: Education but also Criterion A: Ethnic Heritage: Black. 1905 and 1914 would then become “significant dates” (see below) which are noted in the jacket but must also be noted in the Section 8 Summary and narrative.

For properties or districts whose period of significance extends beyond the “50-year mark,” staff recommends using the following language as outlined in the National Register Bulletin 16a: *How to Complete the National Register Registration Form*. “The period of significance ends in 1967 (or whatever date is 50 years ago) when activities begun historically continued to have

importance and no more specific date can be defined to end the historic period.”²⁵ Even if the 50-year mark is used, an appropriate end date is still needed in the narrative if known. For example, if a property’s significance ended in 1983, make a note of it in the Section 8 narrative when discussing the period of significance. This identifies the true ending of significance, and if the nomination is ever updated in the future, it can be edited as appropriate.

The period of significance provides the temporal framework for a property’s context and history, which can be an important factor when considering the appropriate amount of documentation in a nomination. As noted earlier, it is important to provide some history before and after the period of significance to justify its selection; however, the bulk of a nomination’s historic context will fall within the selected period of significance.

Significant Dates:

As the name suggests, significant dates are dates in which a significant event occurred within the period of significance. Not all nominations will have a significant date. Most commonly significant dates include the date of construction, especially for Criterion C arguments. However, they also note when important additions or changes took place in or on a property.

For instance, if the hospital discussed in “Example Two” received an addition at the rear of the building in 1910 that housed an emergency room and operating theater that greatly benefited the community, 1910 could be considered a significant date as it ties into the Criterion A argument for Health and Medicine.

Please note, significant dates cannot occur outside of the period of significance. Dates of minor alterations to a property are generally not considered significant.

General Tips for Section 8

Below are some general tips when considering Section 8 of a National Register nomination.

- **White Rabbits**
Avoid chasing them. White rabbits are considered tidbits of information or lines of thought that are not directly related to the context of the nomination. For example, a former home owner in a residential district may have been a famous writer. While this may be worth mentioning, a full page about the author’s work probably does not belong in the nomination.
- **Peacock Wording**
Also known as puffery, boosterism and bolsterism, peacock words are terms or phrases that are excessively praising in nature. This is when a narrative builds up a person, place,

²⁵ National Park Service. National Register Bulletin 16A: How to Complete the National Register Registration Form. 1997. p. 42

project, etc., generally without any form of verification. They are, most often, opinions. For example,

John A. Smith was a genius before his time in outbuilding design. Brilliant at a young age, Smith learned the value of using local materials by watching his father labor in the noble trade of woodworking for the quaint community of Everytown. John's visionary use of wood beams was without compare and demonstrates his keen aptitude for artistic expression in the folk-vernacular tradition.

Nominations are meant to be **objective** in tone. If someone's work is significant, let it speak for itself. Common peacock words are "renowned," "visionary," "brilliant," "genius," "world-class," "outstanding," etc. Certainly these words can be used in moderation, but strive to keep the tone as impartial as possible. Conversely, downplaying another property or architect to make a better case for the property being nominated can fall into the same trap. Phrases like "short-sighted," "simple," "plain," "ordinary," and "unappealing" are words that can be used to express an opinion instead of providing an objective account of events.

- **Data Dumping/Excessive Scholarship**

Similar to chasing white rabbits, data dumping is the act of providing too much information that may not be necessary to understand a nomination's context. Data dumping differs slightly as it could be on-topic but simply is extraneous. For example, providing the ins and outs of a housing law or each step in the purchase of a property can be highly distracting to a reader. The same can be true of providing too much scholarship on a given subject. A common example is providing too much biographical information of an establishment's historic proprietor and their business or personal pursuits outside of the building being considered. Provide enough information to make a case but get to the point as soon as possible. What does the audience need to know to understand the significance of a property? **If indirect context is needed to understand the significance of the property, briefly note why at the beginning of the context so the reader understands why this information is important.**

- **Fishing**

Fishing is a term used for nominations that provide a lot of interesting facts but do not fully explore any of them as a potential argument for significance. This often occurs in nominations for common property types and/or those that have not completed previous Eligibility Assessments (see chapter "Approaching the NR Process" for more information). For example, a nomination for a stand-alone two-part commercial block building may report that it has unique guttering, contained a store that sold a certain type of can opener in the 1930s, and was built next to the train station. It may state these facts and note they are important in hopes one of them will stick as an area of significance. However, without a discussion that develops each one of these aspects, it does not provide a basis for evaluation.

Remember, **an accumulation of historic facts does not make a property eligible** (see "Layering" below). Generally, more research and focus can resolve this issue but sometimes a property simply is not eligible, which is why SHPO staff always encourage

the completion of an Eligibility Assessment before a nomination is submitted to the SHPO.

- **Layering**

Layering is similar to fishing in that it provides information that, when accumulated, is meant to amount to an argument for significance. It differs slightly as this approach generally falls under Criterion C arguments. Although Criterion C focuses on significance due to the physical traits of a property, there are numerous arguments that fall under it. For example: there is significance due to architectural style or type, significance due to construction method or materials, and significance due to the architect or builder. These are all separate arguments and each must be fully developed. A nomination may state the architect was important, the building is made out of rare materials, and it represents the Tudor Revival style and thus is eligible. For this approach to work the context and argument must be fully developed for each of these claims, which could take a lot of time and effort. If there is a stronger case for some arguments over others, it's recommended to pare down the reasons for eligibility. Other areas of interest can be mentioned as part of a historic context but it must be clear to the reader what the central argument is for National Register significance vs. anecdotal or supporting information. Contact SHPO staff if assistance is needed in this area.

- **Qualifiers**

Somewhat associated with layering, avoid the use of multiple qualifiers when justifying a property's significance. The use of too many qualifiers is often a red flag for reviewers as it often creates a context that is too narrow and even arbitrary in scope. For example, a nomination may state that a property is eligible because it is a great local example of Art Deco architectural styling as applied to a mill framed warehouse constructed between 1910 and 1930. In this case the style, construction method, property type, and construction period are all qualifiers. As written, it is too narrow a context to make a successful case for eligibility. It would be more appropriate to state that the building is a significant local example of Art Deco architectural styling as applied to an industrial building. Comparisons would then focus on all local extant industrial buildings in the Art Deco style (not just those that are Art Deco mill framed warehouses built between 1910 and 1930).

- **Previously Listed Resources**

National Register nominations provide a wealth of information and staff highly recommends reviewing nominations that are similar in scope to a potential project. This is especially important for first-time or new preparers as they can get a sense of how a nomination is typically formatted.

While previously listed nominations are an excellent resource, they can sometimes be a source of misunderstanding when it comes to evaluating the eligibility of other resources. Simply because a resource was nominated and successfully listed does not automatically mean a similar resource will be listed. Every property or district must be considered within their own unique context and must make their own individual case. Depending on the situation, similar listed properties can and should be discussed in a nomination, but the argument cannot be based solely upon the context of another nomination.

In addition, early nominations tend to be bare bones when it comes to developing a historic context. For example, it may not be fully understood why a certain property was considered contributing or non-contributing in 1979 district nomination, as many of the nominations from this time period do not explain their rationale at the time of selection.

Finally, while National Register standards have remained relatively stable, the way they are interpreted by the National Park Service has evolved over time. Historic documentation that was accepted in a 1995 nomination may not qualify today. When in doubt, it is always a good idea to check in with SHPO staff for clarification.

- **Defining Local Contexts**

Most nominations in Missouri are listed at the local level of significance. This typically means the property is considered significant under its area of significance within the confines of the town, city, or town vicinity (if rural) it is located in. On occasion the SHPO receives a nomination that claims it is significant within a specific neighborhood or street. For example, a property may claim it's the best example of a two-part commercial block building within a neighborhood instead of the town. Usually this approach does not work without using a Multiple Property Document Form because it is not made clear why that neighborhood or street should be considered under its own context. If a preparer is contemplating evaluating a property for significance within a geographic boundary that is smaller than the city or town boundaries, we strongly recommend contacting the SHPO prior to submitting a nomination.

- **Locational and Familiarity Biases**

Locational or familiarity biases may happen when the preparer assumes the reader is as familiar with the locale or topic as they are. Typically, this occurs when referencing geographic locations. For example, stating the property is a few blocks down from the arena may mean something to someone from the author's town but may not to a reader from out of state. This can also occur when referencing the names of architects, builders and localized historic events. Missouri's NPS reviewer is located in Washington D.C. and is likely not familiar with local historic events. Write out the full names of streets and provide maps. This can be vital for orientation purposes, especially in districts.

Preparers who are experts on a certain subject sometimes struggle with this issue. A specialist on the architecture of Nelle E. Peters in Kansas City may mention her name assuming the audience knows who this person is. If mentioning an individual, briefly note who they are and why they bear mentioning. If noting a localized event, add a sentence or two that briefly defines the incident. Write for a general audience.

- **Argument**

As noted above, listing facts alone does not make a case of significance for National Register purposes; an argument is needed. Since it is sometimes difficult to comprehend the idea of an argument, the following exercise may be helpful: Assume the reader counters the reason for significance with a "so what?" How would you go about convincing someone unfamiliar with a resource of its importance? Focus on *why* the property is important in relation to its surroundings or level of significance (local, state,

or national). If a property is locally significant for industry in Carthage, it will be necessary to begin by discussing industry in general in Carthage and how the nominated property was integral to Carthage's success. **Remember, every area of significance pursued in a nomination must have its own separate, well-defined argument.**

- **Conjecture**

Take care not to form an argument on incomplete information or assumptions. Conjecture often occurs hand-in-hand with peacock wording. An example of conjecture would be the following: "Mr. Mathis's designs utilize stone; he was influenced by English architecture during his summer trip to London in his mid-twenties." Just because Mr. Mathis went to London for a summer does not mean it had an impact on his architectural designs. Unless there is a record of him stating as much, it would be better to say he *may* have been influenced or simply remove the statement if no supporting evidence can be presented.

- **Clarity and Structure**

A nomination may contain the necessary components of a historic context and a valid argument for significance, however, if Section 8 is ill-structured these components may get lost. Subjects highlighted in this chapter such as data dumping, layering and others are often culprits when it comes to this issue. Formatting the narrative in a logical way is very important when making a case for significance. Too many or too few subsections or having information presented out of a logical order can cause confusion. For example, if a nomination has too many subsections it may not be clear how they relate to one another. Thus the reader may not understand why the information is relevant. If there are too few subsections important data or arguments may get lost in large swaths of text. Additionally, if information is not presented in a logical order the reader may again not understand the relevance of the text until the very end. When structuring a Section 8 narrative consider the resource and the selected area of significance in relation to the period of significance and level of significance. Ask the following: "Why is this information relevant to understanding the significance of this property? What is the most logical way to convey my argument?" Please keep the reader firmly in mind when considering these questions. While *you* know why a resource is significant, your reader may not be as familiar with a specific area of history or knowledge as you are (see "Familiarity Bias" above). Additionally, they may not have a lot of time to read the nomination, thus waiting until the very end of a narrative to explain why the presented information is relevant is not recommended.

- **When in doubt, contact the SHPO**

SHPO staff is more than happy to assist where possible. While staff cannot perform research, they can typically point a preparer in the right direction or provide a similar example that could be useful in preparing a Section 8 narrative or argument. Please contact staff if there are any questions or concerns. That is what the SHPO is there for.

Section 10 Boundaries

Boundary Selection

When selecting boundaries, it is important to keep in mind the property's history, integrity, and context. For instance, if a farm is nominated for significance in agriculture but the boundary does not account for the associated fields, then the boundary may not convey the property's proposed area of significance.

Other tips

- The boundary should include as much of the historic setting as possible. It is not acceptable to include only the footprint of a building in the boundary. Exceptions may include instances where a building takes up the totality of a historic lot, such as some row houses and downtown commercial buildings.
- Boundaries for districts should not cut through blocks. It is typically best to take the boundary to the cross street or to an alleyway. Likewise, it is best to avoid a jigsaw approach of cutting in and out of separate blocks to exclude non-contributing resources in a district. Future activities may occur that could impact integrity, such as removing non-historic siding. It is much easier to change the contributing status of resources that are already in a National Register boundary vs. expanding the boundary for resources that were originally left out.
- Current owner boundaries may be used if they are in keeping with the historic boundary. However, keep in mind current ownership alone is not a deciding factor in the boundary selection.
- Consider if perimeter resources like sidewalks, retraining walls, curbing, etc. should be included in the boundary.

Verbal Boundary Description (Section 10)

This section of the nomination should be used to describe the location and boundaries of the resource in greater detail than those listed on the jacket. This section provides the opportunity to define the geographic parameters of the nomination. Note if parameter resources like a sidewalk along a street is within the nominated boundary or is excluded from it. There are several methods for describing the boundaries, including legal descriptions, block numbers and confinements of land from a fixed point like a street intersection. **Likewise, a map can be used in lieu of a narrative.** In this case, simply note in this section that the boundary is indicated on an accompanying map. The map should clearly define the boundaries; include a directional arrow or compass, and a scale. Ideally an aerial map will be used for this purpose so it is clear what resources are within and outside of the boundary. See the chapter on [maps](#) for more information.

Example: Single site nomination.

All of Lot 2, Block 23, Original Town, Section 9, Township 62, Range 15 -- a sector laid out in the center of Kirksville, Adair County, Missouri.²⁶

Example: District nomination.

The Kingshighway Hills Commercial District is bounded on the north by Tholozan Avenue, on the east by S. Kingshighway Boulevard and on the west by a 20-foot wide alley that parallels S. Kingshighway Boulevard. The southeast corner of the district touches Chippewa Street then extends northwest, parallel to Lindenwood Place, which intersects with Chippewa Street. The district consists of two commercial blocks facing S. Kingshighway Boulevard that represent the original commercial strip associated with the Kingshighway Hills subdivision platted in 1926.²⁷

Boundary Justification (Section 10)

Please note the Boundary Justification must include the reasoning why the boundary was selected vs. solely being descriptive in nature. For more information about writing boundary justifications see *Bulletin 16A*.

Example: Single site nomination.

The boundaries of the nominated property include the parcels of land historically associated with the resource.²⁸

Example: District.

The district's boundaries encompass the original platted Kingshighway Hills commercial strip facing S. Kingshighway Boulevard. The boundaries include all of the original buildings associated with the planned commercial strip. Tholozan Avenue historically separated the district from auto-related commercial properties north of the district. Commercial buildings immediately south of Chippewa Street are contemporary. The area east of the district was not developed commercially until the 1950s. The area west of the district is residential.²⁹

²⁶ Woodcox, Cole. "Sojourner's Club" National Register of Historic Places nomination. 2013

²⁷ Keenoy, Ruth. "Kingshighway Hills Commercial District" National Register of Historic Places nomination. 2020.

²⁸ Rieke, Lauren. "Plaza House Apartments" National Register of Historic Places nomination. 2013.

²⁹ Keenoy, 2020.

Owner/Elected Official Information

Owner and Elected Official Notification³⁰

The SHPO is required to notify all property owners (public and private) that their property is being nominated to the National Register. Private property owners are given a period to object to the listing if they so desire via a notarized letter as outlined in 36 CFR 60.6(g)³¹. In order to comply with the regulations, the preparer must provide the SHPO the mailing addresses of all property owners contained within the nominated area regardless of contributing status. The information must be submitted on the Exhibit A “Property Owners Sheet” included in [Appendix III](#).

The final certificate can only be mailed to a physical address for single site nominations. For this reason, include the physical address in addition to a P.O. Box address. This is not required for district nominations with multiple owners because the certificate is sent to the mayor in which the district is listed. To ensure that the correct and current owner has been notified, it is required in the regulations that the preparer check either official land records or tax records for current ownership. Owner information must be accurate by the time it is submitted to the SHPO. Note: Preparers must notify the SHPO if a building or site is owned by the federal government (post offices, certain court buildings, etc.). When properties are owned by the federal government, the SHPO is required to notify the Federal Preservation Officer (as the owner). Failure to notify the federal owner is considered an administrative error and could cause delays in the nomination process.

The SHPO is also required to notify county *and* municipal elected officials of any nominations within their jurisdiction. This information must be submitted on the Exhibit B “Elected Officials Sheet” included in [Appendix IV](#). For unincorporated properties, please include the information of just the county official.

The “Property Owners” and the “Elected Officials” sheets will be due at the revision deadline. Deadlines are posted on the SHPO website.

³⁰ Notifications are outlined in 36 CFR 60.6 (b-c) Federal Regulations.

³¹ 36 CFR 60.6(g) only applies to private property owners. Per 36 CFR 60.6(t), public property owners may petition to the NPS during the 15-day commenting period (this period is outlined in 36 CFR 60.13) once the nomination is at the National Park Service for consideration.

Multiple Property Documentation Forms

Nominating a Property under a Multiple Property Documentation Form

A Multiple Property Documentation Form (MPDF) is a means of recording the context of properties that share a common theme or background. While they are not nominations in and of themselves, they are used as an evaluation tool and can make the nomination process for related property types easier. For instance, it could be difficult to nominate a simple gable-front rural church for its architectural merit by itself. Rural churches tend to be plain in appearance and are somewhat ubiquitous throughout the state. However, a comparative study of rural churches completed in 2010 by SHPO staff revealed a common typology. This study was turned into *Rural Church Architecture of Missouri, c. 1819 to c. 1945*, a MPDF that included a historic context for rural church evaluation. This MPDF made listing some rural churches more feasible as the extensive research necessary to create a working context on Missouri's rural churches had been completed, significance discussed, and well-defined types identified.

MPDFs are divided into two main sections: the historic context and associated properties types. The context of a MPDF, Section E, provides the historic information as it pertains to a resource. The associated property type section, Section F, designates property types that can be nominated under the MPDF including what criteria of significance may apply and registration requirements.

While this guide does not include a section on completing a MPDF, the National Park Service has a bulletin on the topic, which can be found here:

<https://www.nps.gov/subjects/nationalregister/upload/NRB16B-Complete.pdf>

Remember, a district or property must be eligible on its own, even if using a MPDF. Stating a property is covered under a MPDF in a nomination by itself is not enough to make the case for listing. It is important to explain how a property fits under a MPDF both for the context and the property type (sections E and F).

In the Section 8 Summary, Narrative, and Conclusion of a National Register nomination, note what specific context(s) (Section E) and the specific property type (Section F) a property or district falls under. Explain *how* it correlates to a context in Section E and *how* it meets the property type and registration requirements outlined in Section F. Take care to check Section G of the MPDF to ensure the nominated property or district falls under the geographic parameters of the context. Likewise, the period of significance for a nomination under a MPDF must not fall outside of the context provided. For example, if a MPDF provides context for commercial districts in a community up to 1955 a nomination cannot have a period of significance up to 1960. In this case the nomination must adhere to the MPDF, list the district without the MPDF, or amend the MPDF.

MOACHP members have stated they do not want to re-read a MPDF every time a property is nominated under it. Thus, it is always a good idea to provide a quick summary of the main points of a given context as a refresher.

“The context in a listed MPDF should not be repeated in related nominations, although salient aspects should be summarized.” – Barbara Wyatt

“The Components of a Historic Context.”

National Register White Paper. 4.9.2009.

Like any working document, MPDFs can become dated. In some cases it may be best to list a property without the MPDF or consider amending a MPDF before proceeding with a nomination. Please contact the SHPO for advice before a nomination is prepared if there is a question of fit. The SHPO can also provide a list of MPDFs and may be able to offer successful examples of recent nominations utilizing a specific MPDF.

Submission requirements for new MPDFs are noted below. Because of the complex nature of MPDFs, the SHPO must be contacted well in advance of a nomination submission deadline. It is recommended to contact the SHPO as early in the process as possible.

Submission requirements for a new MPDF:

- Any new MPDF must have an accompanying nomination with it at the time of submission.
- Contact the SHPO 60 days in advance of a submission deadline to discuss the project.
- A new MPDF and accompanying nomination must be submitted 30 days in advance of a submission deadline.

Source Citations, Plagiarism, and Writing

A sound historical narrative must conform to standard writing practices and include properly formatted bibliographical information, citations and original text.

Source Citations

In the realm of historical writing, the Turabian (Chicago) Style represents the appropriate method of citing information sources in footnotes and the bibliography. Examples of proper source citations can be found in Kate L. Turabian's *A Manual for Writers of Research Papers, Theses, and Dissertations*.³² The information for this style guide is also widely published on the Internet. For SHPO purposes, footnotes for citations are required — endnotes or parenthetical citations will not be accepted. If there are any troubles with formatting, please contact the SHPO.

Sources

A lack of sources is a “red flag” for nomination reviewers. A deficiency in the number of source citations indicates that there could be plagiarism, inaccurate information, or too much conjecture used to support the document's main points.

The nature of National Register nominations, especially since they are used for planning and research purposes, requires the documents to follow sound academic practices. This includes using reliable sources and accurately retrieving information from source material. Reviewers can and will check the factual accuracy of sources if necessary. For further discussion on determining relevant and reliable sources, see *Turabian* (section 3.4).

Footnotes

The Missouri SHPO will **only** accept nominations with properly cited footnotes. Chapters 16 and 17 in the Turabian Style guidebook discuss at length the proper footnote format for a wide variety of source types (e.g. books, newspapers, journal articles).

Footnotes **must** be used to cite a source when you quote exact words from a source; paraphrase ideas that are associated with a source, even if it isn't an exact quote; or use any idea, data or method attributable to any consulted source. For more information, see *Turabian* (section 15.2).

DO NOT use “blanket citations.” In other words, sentences must be cited as you go along. A single citation at the end of the document for a source is insufficient because it does not state which pieces of information were gleaned from that source and where the information can be found in that source. Similarly, a single sentence or citation at the beginning of the document that

³² For the purposes of this guide, SHPO utilized the 7th Edition of Kate L. Turabian's *A Manual for Writers of Research Papers, Theses and Dissertations*. Although the 8th Edition is the most current, the topics and corresponding section numbers stay consistent between the different editions.

mentions a particular source will be used throughout the narrative is also unacceptable, with one exception. A blanket citation may be used to reference an up-to-date architectural survey that serves as the source for individual architectural descriptions in Section 7 of a district nomination.

Additionally, if several sources are utilized to make a single point, use one footnote/citation containing the sources used—list them in the order they appear in the text and separate each with a semicolon. See *Turabian* format (section 16.3.5) for complete citation format.

Footnotes in a nomination are also acceptable outlets to discuss a slightly off-topic point or anecdote that is worthy of mentioning but might disrupt the sentence flow in the text.

Bibliography

Bibliographical entries are needed for every source used in the document. Do not forget to include the source material used for figures and maps. Please note that bibliographical citations are not identical to footnote citations. See *Turabian* Chapter 16 and 17 to ensure that the bibliography (Section 9 of the nomination) meets Turabian Style standards.

Examples³³: Located below there are three citation versions: in the image, “1.” and “2.” refer to the note citation form and note short-form, respectively. Below that, without a number, is an example of a bibliography citation.

Book

One author

1. Malcolm Gladwell, *The Tipping Point: How Little Things Can Make a Big Difference* (Boston: Little, Brown, 2000), 64–65.
2. Gladwell, *Tipping Point*, 71.

Gladwell, Malcolm. *The Tipping Point: How Little Things Can Make a Big Difference*. Boston: Little, Brown, 2000.

Journal article

In a note, list the specific page numbers consulted, if any. In the bibliography, list the page range for the whole article.

Article in a print journal

1. Alexandra Bogren, “Gender and Alcohol: The Swedish Press Debate,” *Journal of Gender Studies* 20, no. 2 (June 2011): 156.
2. Bogren, “Gender and Alcohol,” 157.

Bogren, Alexandra. “Gender and Alcohol: The Swedish Press Debate.” *Journal of Gender Studies* 20, no. 2 (June 2011): 155–69.

³³ Examples courtesy of: http://www.press.uchicago.edu/books/turabian/turabian_citationguide.html. Accessed 11/16/2015.

Newspaper article

Newspaper articles may be cited in running text (“As Elisabeth Bumiller and Thom Shanker noted in a *New York Times* article on January 23, 2013, . . .”) instead of in a note, and they are commonly omitted from a bibliography. The following examples show the more formal versions of the citations.

1. Elisabeth Bumiller and Thom Shanker, “Pentagon Lifts Ban on Women in Combat,” *New York Times*, January 23, 2013, accessed January 24, 2013, <http://www.nytimes.com/2013/01/24/us/pentagon-says-it-is-lifting-ban-on-women-in-combat.html>.

2. Bumiller and Shanker, “Pentagon Lifts Ban.”

Bumiller, Elisabeth, and Thom Shanker. “Pentagon Lifts Ban on Women in Combat.” *New York Times*, January 23, 2013. Accessed January 24, 2013. <http://www.nytimes.com/2013/01/24/us/pentagon-says-it-is-lifting-ban-on-women-in-combat.html>.

Plagiarism

Plagiarism in any form is unacceptable and is sufficient reason for the SHPO to not process a nomination. Plagiarism occurs when information from a source is used but not cited; a source is cited but the exact words were used and not put into quotation marks or blocked quotation; or a source is paraphrased and cited, but the words used are too similar to the original. Please visit <http://www.plagiarism.org> or consult *Turabian* (Section 7.9) for additional information.

Copy and Pasted Material

Copy and pasted material in a nomination is only acceptable in Section 7 for architectural descriptions taken from survey forms provided that the description has not changed by the time of the nomination. If this is done, it needs to be stated and properly cited at the beginning of the section.

Copy and pasted material is **not** acceptable in Section 8 of any nomination. Preparers sometimes copy large swaths of text from historical sources, especially previous National Register nominations and architectural surveys. This is not an acceptable practice even if it is properly cited. All information taken from *any* other source must be properly cited immediately and as often as it is referenced. The SHPO regularly checks references and sources.

Citing Your Own Work

If your nomination references your own published work or research, it still must be cited appropriately just like any other source from a different author.

Use of Quotations

Every quote must be cited with a footnote and its source noted in the bibliography.

Overuse and Run-on Quotations

In Section 8 of the National Register nomination, a frequent problem is quote-heavy narratives. While quotations can be useful in historical writing, they need to be used carefully. Among other things, an overabundance of quotations indicates that the writer did not conduct sufficient research or analysis to craft the narrative in their own words.

Quotations should be used sparingly. In other words, do not quote if you can paraphrase. However, quoting is acceptable when the original words are especially memorable or when paraphrasing cannot adequately express the intended idea.

When quoting passages fewer than five lines, enclose the exact words in the text by using double quotations marks (“ ”). Use an ellipsis for omitted words. More information can be found in *Turabian* (section 25.2.1).

Example

The reviewer advises that “this is an example of a standard run-in quotation.” ¹

Block Quotations

Quotations five lines or longer should be written in single-space block quotation format (See *Turabian* section 25.2.2.).

In the examples below, note the formatting differences between the two types of block quotations. In the first example, the block quote is introduced by a complete sentence, so a colon is placed before the quote. In the second example, only an introductory clause precedes the quotation, so a comma is used. For any block quotation, the entire block must be indented. In the second example below, note that the first line is indented one step further when the quote actually begins a paragraph in the original source.

Examples³⁴

King analyzes the possible identities of the six Cherokee chiefs who appeared in London in 1790 and 1791:

The number, description, and dates fit only a group led by William Augustus Bowles, whose presence in London was widely reported in the contemporary press. Bowles himself was indeed no Indian, but a Tory American, an early “Indian hobbyist” who was perhaps the most colorful adventurer and imposter of the southern frontier. His companions were, however, Indians, and it is clear from several contemporary references that three of them were Cherokee and two Creek. Bowles himself wrote out their names at the head of a letter to the king.¹

According to King,

The delegation, an invention of Bowles, cannot be understood apart from his biography and his personality. He was born in 1763 in Frederick, on the Maryland frontier, the son of Thomas Bowles, an immigrant from London, and his wife, Eleanor. At the outbreak of the Revolution the family were Tories, and William went to Philadelphia in the fall of 1777 to enlist as a common soldier in one of Gen. William Howe’s regiments. He soon shifted to the new regiment of Maryland Loyalists . . . and was shipped to Jamaica and thence to Pensacola.¹

Grammar

Proper grammar is an important aspect of the nomination and preparers are encouraged to thoroughly proofread the document before a draft is submitted to the SHPO. Additionally, having a second set of eyes to look over the nomination frequently catches additional errors. SHPO staff may occasionally point out typographical errors, but the purpose of their review is to focus on how a nomination meets National Register standards vs. type-editing concerns.

³⁴ **Examples courtesy of:** <http://www.wcu.edu/academics/campus-academic-resources/writing-and-learning-commons-walc/writing-support/research-and-documentation/turabian-chicago-documentation-style/turabian-bibliography/turabian-block-quotations.asp>. Accessed 11/16/2015.

Maps

Since there are numerous ways to create maps for a National Register nomination, this section will provide examples of effective maps and list key features that each type of map must contain.

There are typically three types of maps required for nominations: contextual map; site/boundary map, and photo map. Although they are often combined with a site map, an additional map is required for to illustrate the contributing status for districts or single sites with multiple resources. Each will be discussed below for both single site and district nominations. The photo map and site map (or floor plans) can often be combined into one, as long as the resulting map is not too cluttered—see the district photo map example below and/or refer to the “[Section 7](#)” chapter of this document.

The NPS has a document available online that provides instructions on using various programs and websites to create maps for National Register nominations. This document can be found at the following link:

https://www.nps.gov/subjects/nationalregister/upload/GIS_Guidance_2013_05_15_508.pdf

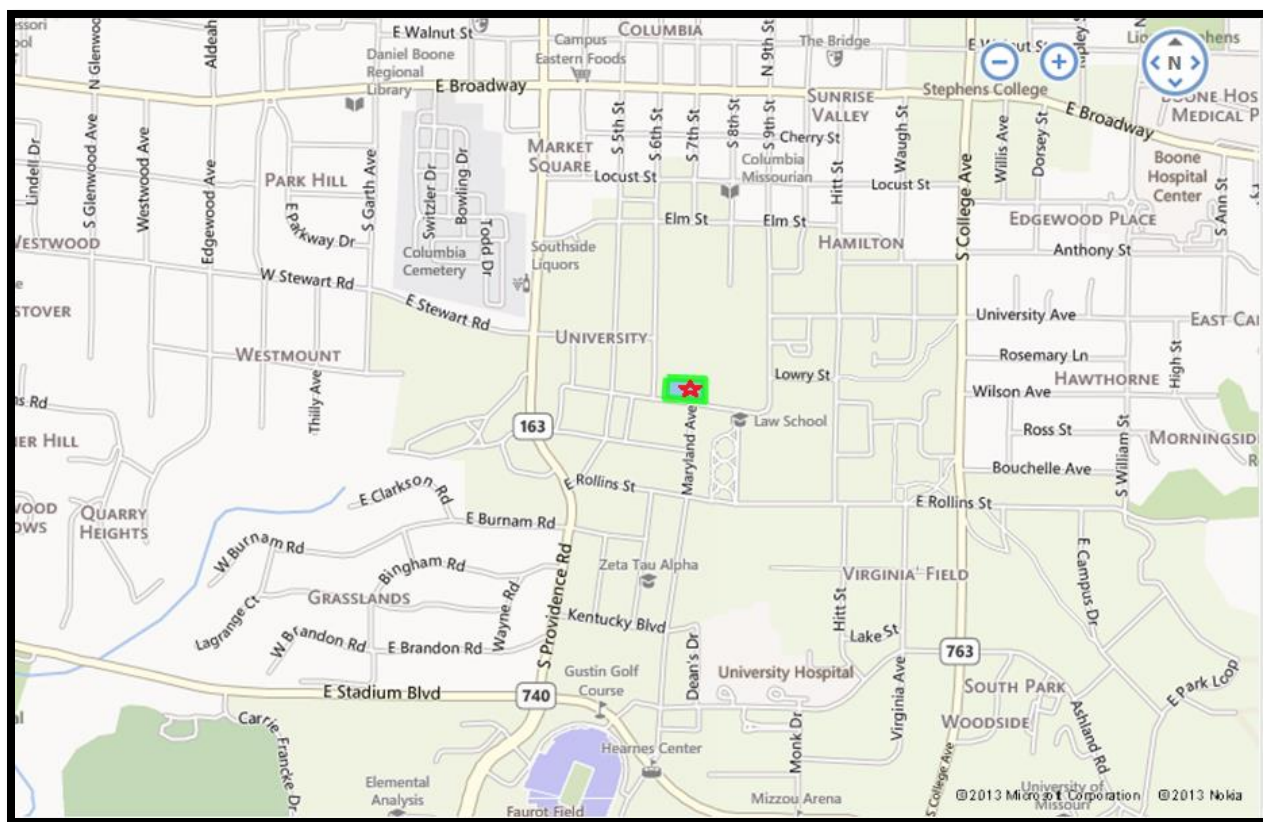
Please note, the Missouri SHPO does not accept UTM or USGS topo maps.

Contextual Map³⁵

A contextual map does not need to be quite as detailed as the site map. Instead, it should simply display and pinpoint a footprint outline of where the building or district falls in a broader geographic context. This can be accomplished in the same way as the above maps, but it is often better to use a “road map” display instead of an aerial image. The figure below is a simple example of a contextual map created using Bing.

³⁵ A scale is not necessarily required for the contextual maps, but it certainly would not hurt.

Contextual Map Example



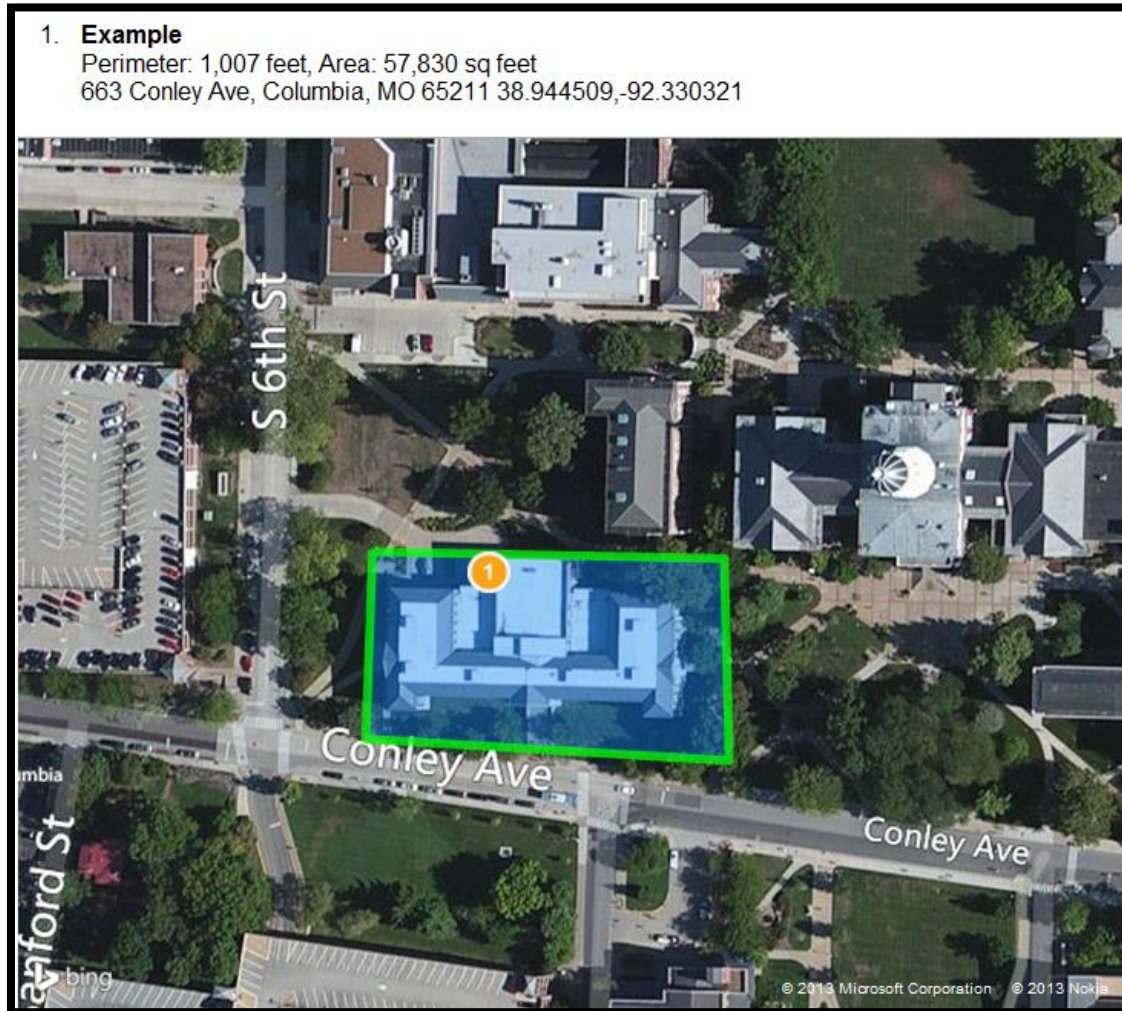
Site Maps

Site maps are aerial maps that identify the nominated resource(s), the National Register boundary, and display the immediate setting and locational context. The figure below is a great example of how a site map should look. Notice that it is clear and contains no ambiguity concerning the location, address and geographic information. Whether Google Maps, Bing Maps, ArcGIS Explorer Online, ArcMap, or another program is used to create site maps for a National Register nomination, it must contain several key features:

- Each map must contain a north directional indicator. This can be in the form of a north-facing arrow, compass rose or any other commonly recognizable symbol that indicates direction.
- Resource's street address.
- Clearly visible latitude and longitude coordinates.
- A boundary line indicating the National Register boundary.
- The map must be reproducible in black and white.

- Street names must be labeled. The map should also show bordering street names.
- The map should include a scale, or say “Not to scale.”
- Contributing status of any secondary resources for single site nominations (see below for district map requirements). Please note if the map is too cluttered, a secondary map may be needed (see Buchanan Residence example below).

Example Site Map- Bing ³⁶



³⁶ If Bing Maps is used to create a map, the preparer must add a “north directional arrow” after the map is printed or exported from Bing. This can easily be done in Microsoft Paint, Publisher or Adobe Photoshop by either imposing an arrow on top of the image or adding a symbol image below or beside the map.

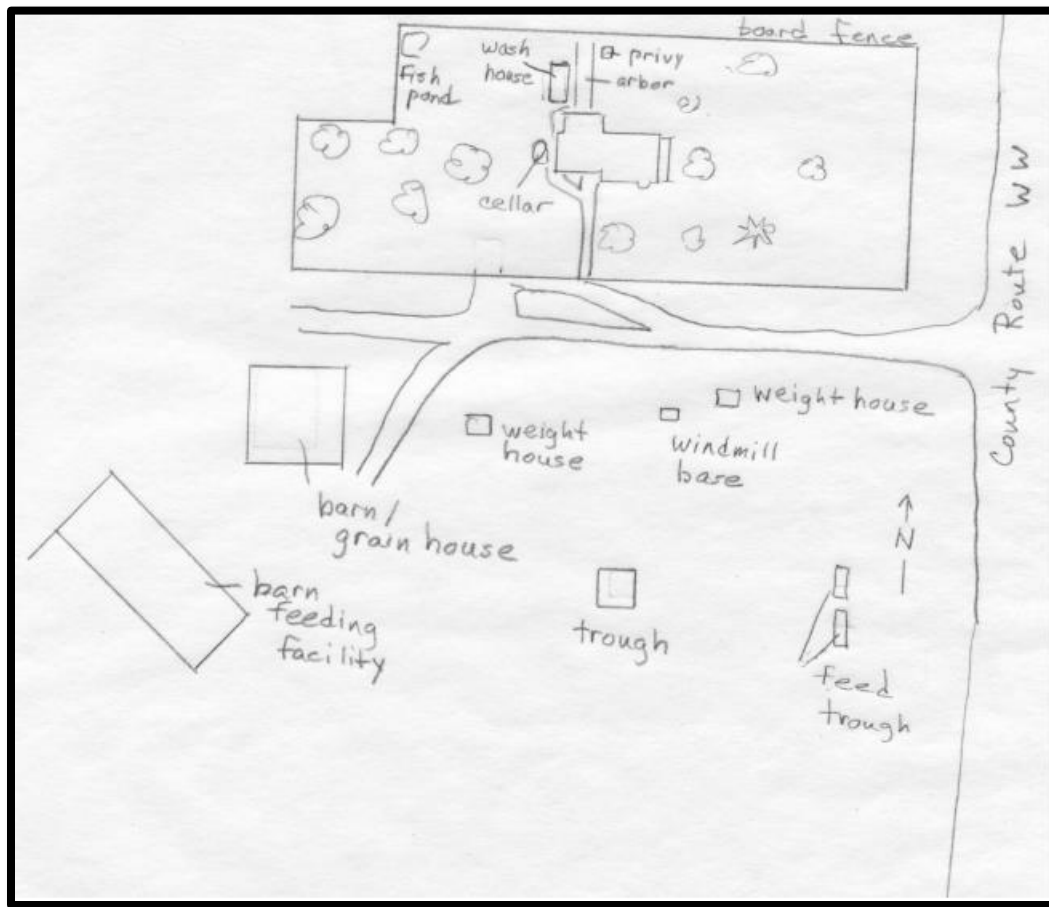
Bing Maps will only provide a scale on the map if you take a screen capture and crop the image. The image above used the “print” function to make a print-ready or PDF-ready document; this method removes the scale from the image.

ArcGIS Explorer Online Site Map Example ³⁷



³⁷ ArcGIS Explorer Online is an excellent tool for creating maps. It's slightly more complicated to use than Bing Maps, but the customizability and superior map it produces outweighs the learning curve. This in-browser tool can be accessed for free at: <http://www.arcgis.com/explorer/>

Hand-Drawn Example³⁸



Multiple site maps for cluttered or complex resources³⁹

If numerous properties are noted in the resource count, a map may become too cluttered to record both lat/long coordinates and the contributing status of counted resources. In this case, two maps may be necessary. Below are screenshots from a nomination in Joplin for the Buchanan Residence. The first example notes the lat/long coordinates and the second depicts the boundary and contributing status of resources.

³⁸ Screenshot from Chalfant, Rhonda. "Prairie View Stock Farm" National Register of Historic Places Nomination, 2015.

³⁹ Screenshots from Belk, Brad; Rhoads, Shakira, Diedrich, Michelle (ed). "Buchanan, Lucius P. Residence" National Register of Historic Places Nomination, 2016.

Google Earth Example



Figure 1: Lat/Long Map
Buchanan Residence
3708 E University Parkway, Joplin, Jasper County, Missouri
Lat/Long: 37.096535, -94.464434
Source: Google Earth, accessed 03, September 2015

Google Maps District Example (showing c and n/c resources but without lat/long coordinates) ⁴⁰

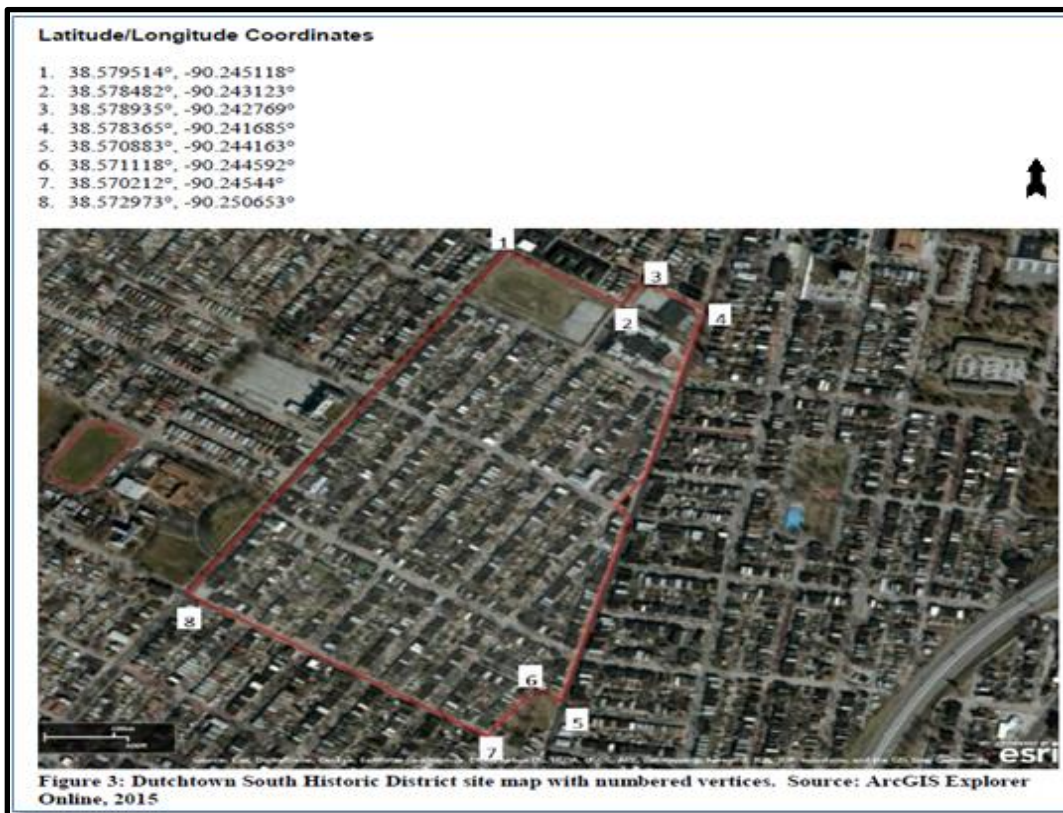
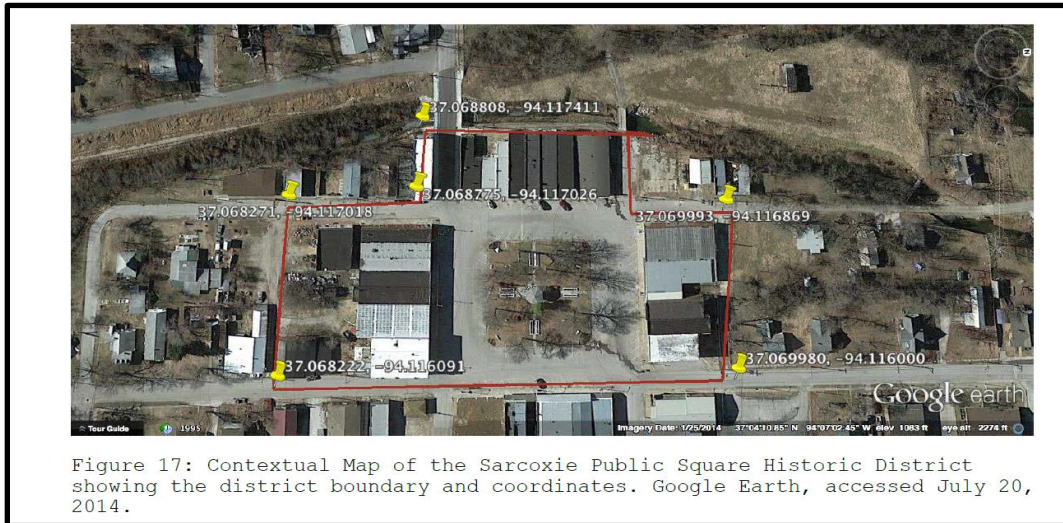


Figure 3: Buchanan Residence Site Map
Source: Google Maps, accessed 23 March 2016

- District Boundary
- N/C Pond
- C House
- C Parking lot
- C Walkway, Patio and Stairs
- C Fountain
- N/C Entrance Wall

⁴⁰ A Google account is needed to create a Google Map. Once in Google Maps, log-in, go to menu and select “Your places” and then hit the “Maps” tab. From there a new map can be created.

Example Site Maps for a district⁴¹

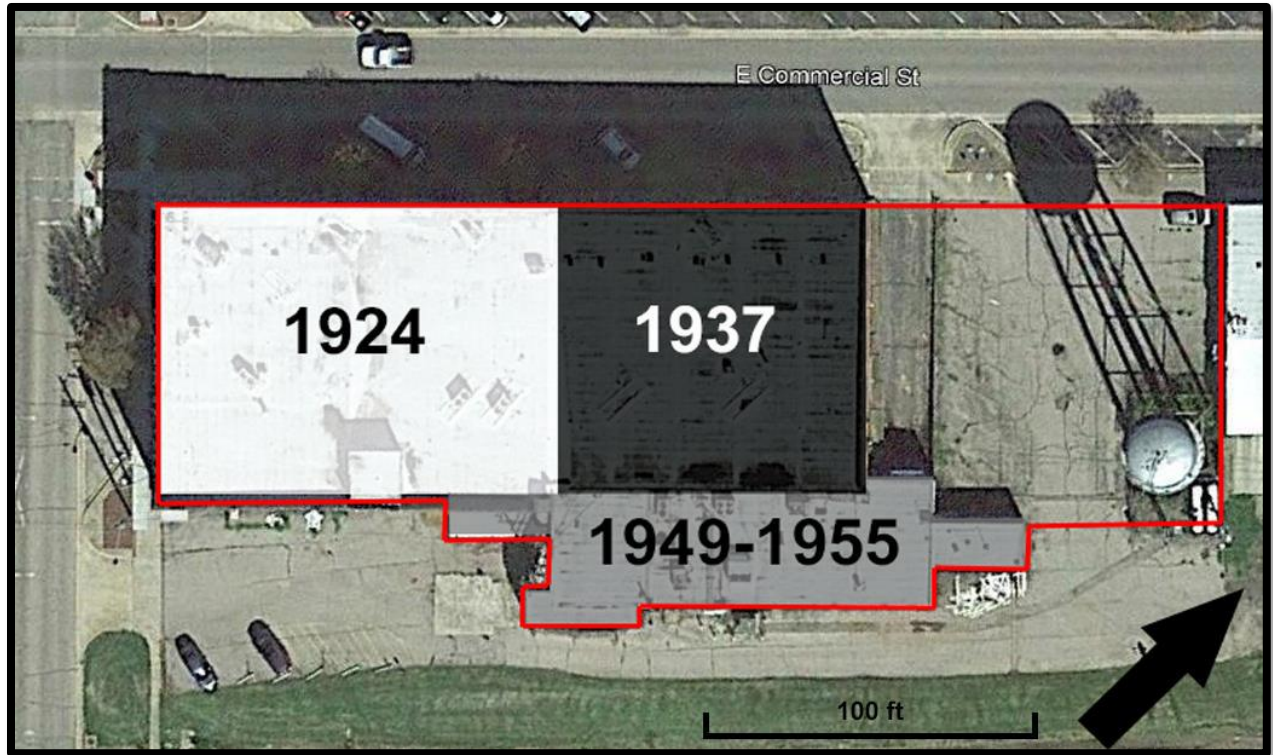


⁴¹ Above screenshot from Gautz, Michelle; Chase, Kristi. "Sarcxie Public Square Historic District" National Register of Historic Places nomination. 2014.

Below screenshot from Josse, Lynn. "Dutchtown South Historic District" National Register of Historic Places nomination. 2015.

Site Map Illustrating Additions⁴²

As noted in the chapter discussing Section 7, a site map (or floor plan) illustrating the location and date of additions on a single site nominations is typically needed.



Rice-Stix Building
200 East Commercial Street, Lebanon, Missouri.
37.681448°
-92.662265°

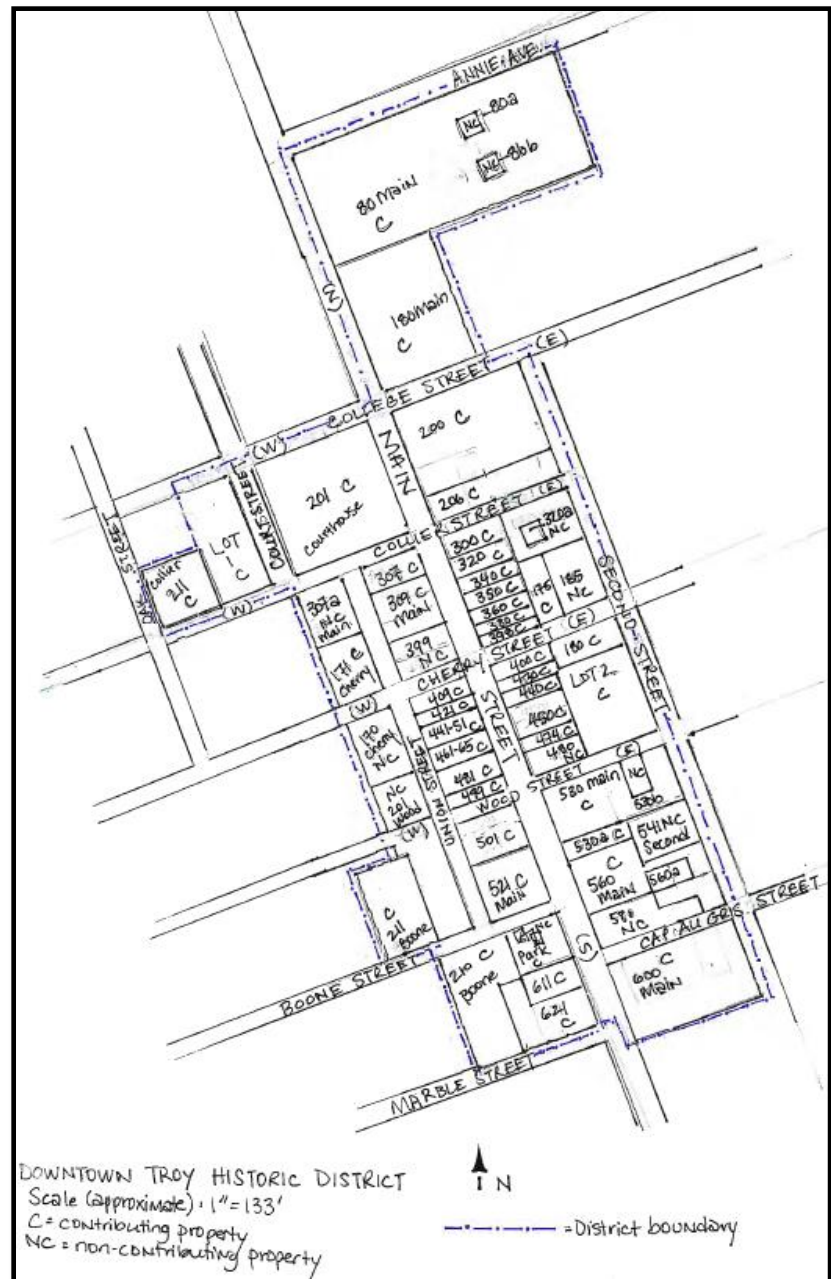
⁴² Image is from Rosin Preservation, “The Rice-Stix Building” National Register of Historic Places Nomination, 2019

District Maps ⁴³

For district nominations, the SHPO requires a site map as well as a district map containing the following features:

- Street names and building addresses⁴⁴
- Identification for contributing and non-contributing resources
- Secondary resources (and their status as contributing or non-contributing)
- Directional arrow or indicator
- District boundary line
- A legend or key that define the symbols used.

While digital maps are preferred, hand-drawn maps—like this example—are perfectly acceptable as long as they are tidy and readable.



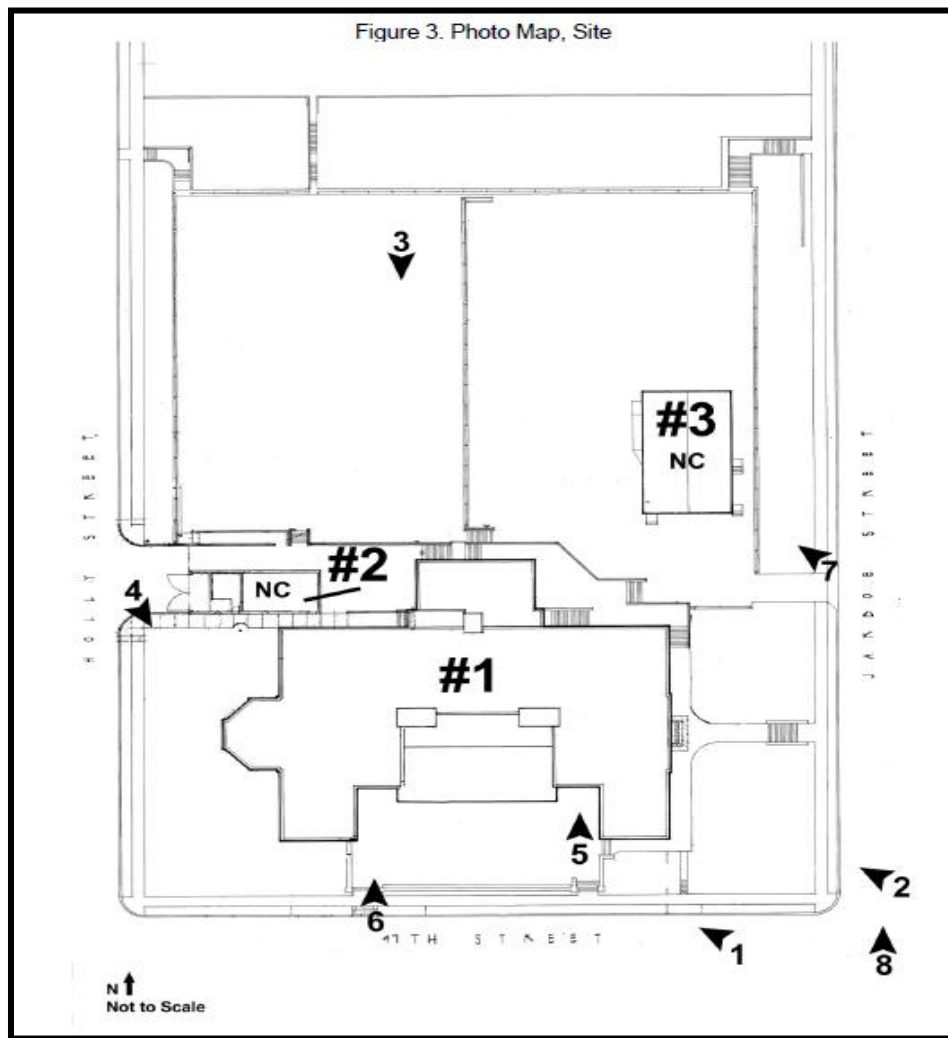
⁴³ Example map is from the Troy Downtown Historic District NR Nomination (Listed 10/30/2013).

⁴⁴ Building addresses are strongly preferred, as they are much easier to search when they are eventually posted online. However, if it is not possible to use street numbers the inventory numbers associated with the property in the Section 7 description may be used instead. Speak to SHPO staff for clarification.

Photo Map

The NPS **requires** that all photographs submitted with a National Register nomination be keyed to a photo map. For instance, if there are 15 photos for a nomination, then there must be a map of the property or district that displays the number, location and direction from which each photograph was taken; the number must correspond to the photo number in the nomination jacket. For single site photo maps, use the current floor plan to document the photos. The two images below provide examples of a single site photo map and a district photo map.⁴⁵

Figure: Single Site Photo Map



⁴⁵ Single Site Photo map from Nugent, Rachel; Rosin, Elizabeth. "E. F. Swinney School" National Register of Historic Places nomination. 2013

District Photo map from Schwenk, Sally; Davis, Kerry. "Howard Neighborhood Historic District" National Register of Historic Places nomination. 2007.

Figure: District Photo Map

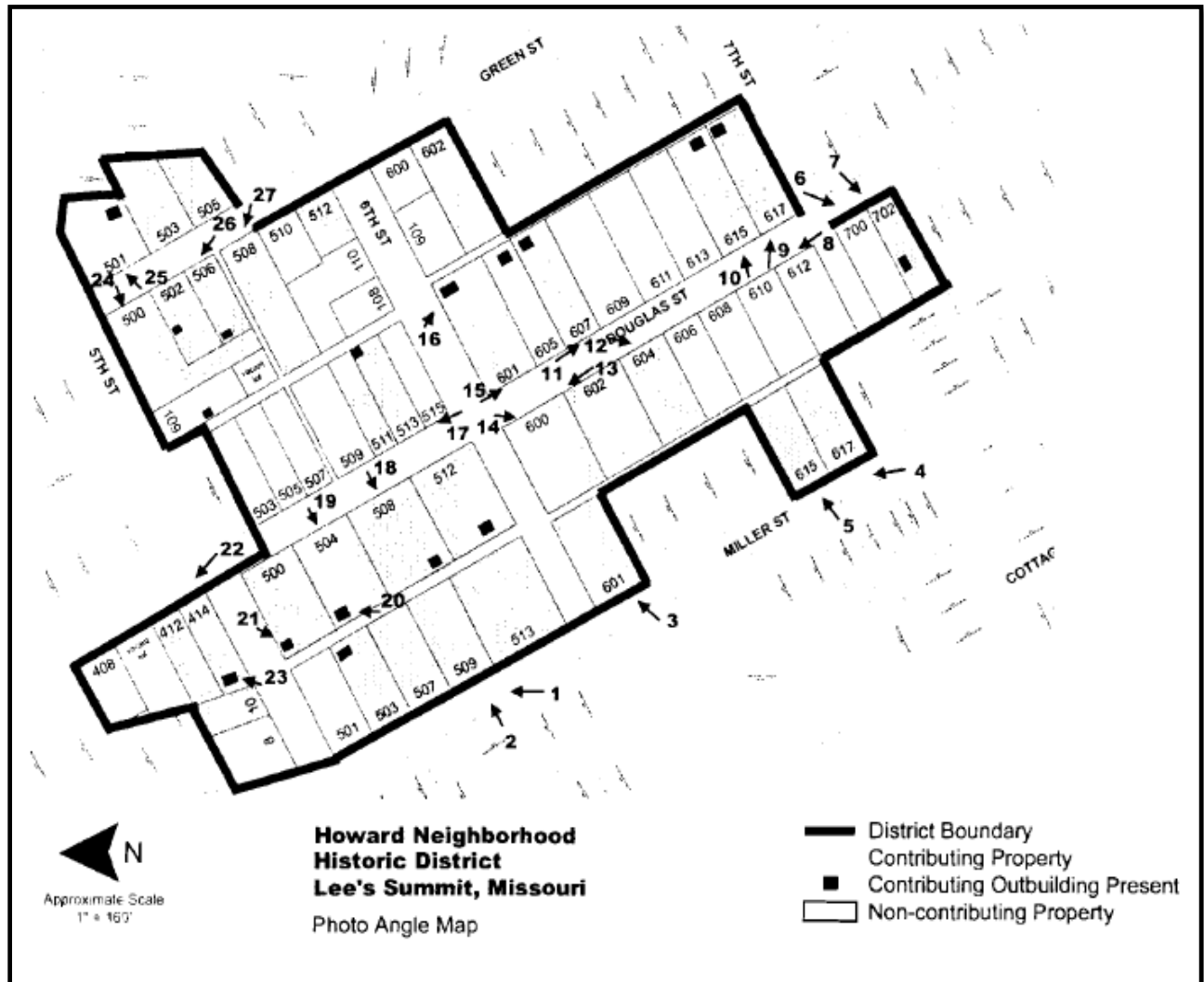


Photo Policy

Often, visual documentation is the most accessible and understandable part of a nomination. It is important that photos contain sufficient information to illustrate the integrity and significance of a property, and that they be processed in a manner that will ensure high permanence. The photos must show the principal facades and the environment or setting in which the property is located. Additions, alterations and intrusions should appear in the photos. For districts, streetscapes -- a view that shows several buildings and their relation to the street -- are more important than views of individual buildings, although major buildings and styles must be represented.

Photographic Coverage Requirements

Digital photographs submitted with National Register of Historic Places nominations must be clear, have an unimpeded view of the building, and provide an accurate visual representation of the property and its significant features. They will illustrate the qualities discussed in the description and statement of significance and be referenced in the text. For single property nominations, photographs must show the setting, each exterior elevation, character defining features, noteworthy interior spaces, outbuildings and any alterations that have affected the property's historic integrity. For elevation photos, ensure the whole elevation is included in the image. A few close-ups of noteworthy features such as primary entrances can then be included. For districts of residential, commercial, or industrial neighborhoods, the photos will primarily be streetscapes. District photographs must depict major building types and styles, pivotal buildings and structures, and representative noncontributing resources. While it is not necessary to include photographs of individual resources as official photos for districts, additional images may be needed so that SHPO staff can review the Section 7 property descriptions. See "[District Requirements](#)" in the "Introduction" chapter above for more information. As SHPO staff rarely have the opportunity to visit the nominated property or district in person, staff relies on the nomination's photographs to view features like siding, window, and roof materials; window divisions; porch details; additions; and stylistic details. Often times, staff is able to tell if the material is historic or not based on the photo, so clear images are important.

The necessary number of photographic views depends on the size and complexity of the property or district. Submit as many photographs as needed to depict a nominated area's current condition and significant features. On average, a single site nomination will have between 10 and 15 photographs. Depending on the size, a district nomination averages 15 to 25 photographs. If preparing more than 30 photographs, please contact the SHPO to ascertain what a reasonable number of photos are for the project. Keep in mind additional images can always be included in the nomination as a figure vs. a formal photo.

For additional information on photography, preparers may wish to consult *National Register Bulletin 23: How to Improve the Quality of Photographs for National Register Nominations* <https://www.nps.gov/subjects/nationalregister/upload/NRB23-Complete.pdf>. Although *Bulletin 23* was written before the digital revolution, it provides a clear explanation of the technical aspects of photography and how to obtain the best representative images as they pertain to National Register nominations.

Likewise, the 2013 photo policy update from the National Park Service is recommended: https://www.nps.gov/subjects/nationalregister/upload/Photo_Policy_update_2013_05_15_508.pdf

Photo submission requirements are listed below.

- Photographs must be taken within 12 months of the potential MOACHP meeting. Alternatively, the date of a site visit can be added to the date field of the photo log in the jacket to confirm the accuracy of the photos. Speak to SHPO staff before adopting the latter option.
- Photo locations and directions must be indicated on a map, building footprint, or site plan.
- Reference all photos in Sections 7 and 8 of the National Register nomination. If the photo cannot be referenced in the nomination, it is likely extraneous and can be removed from the nomination submission.

Digital Files:

- Set digital cameras to save color digital images as RAW or uncompressed TIF files if possible. This allows for the best image resolution. JPEGs converted to TIFs, *by a computer conversion process*, are acceptable if the image is at the correct resolution; however, JPEGs must not be altered in any way prior to conversion. No cropping or retouching is allowed.
- Digital images files must be in color.
- The size of each image should ideally be at 3000 x 2000 pixels at 300 dpi. This generally requires a digital camera resolution of six megapixels or greater. The minimal acceptable size is 1200 x 1600 pixels, requiring a digital camera resolution of two megapixels. To keep the file size manageable, each image should be less than 10 MB if possible.
- No manipulation of the images is allowed.
- For maximum detail, digital images should be saved in 8-bit (or larger) color format.
- The order of the .TIF files must correspond to the photo log that is included in the jacket of the nomination.
- The digital photo labels will contain the state, county, full nomination name and photo number with underscores. For example, the image files for the John Doe Pub in Iron County, Missouri, would be saved as:
 - “MO_Iron County_John Doe’s Pub_0001,”
 - “MO_Iron County_John Doe’s Pub_0002,” etc.

Use of National Register Images and Text

The Missouri State Historic Preservation Office and the National Park Service reserve the right to use photographs and text submitted as part of a National Register nomination for both print and electronic publication purposes.

For More Information

Missouri Department of Natural Resources
State Historic Preservation Office
P. O. Box 176
Jefferson City, MO 65102
573-751-7858
mostateparks.com/shpo

Appendix I Nomination Review Checklist

Available at: <https://mostateparks.com/sites/mostateparks/files/NRTechnicalChecklist.pdf>

		Item 1	Are the Historic name, Other name, and Name of related Multiple Property Listing completed or marked n/a?
		Item 2	Have the boxes for “not for publication” and “vicinity” been marked either n/a or with an X?
		Item 3	For SHPO use only, leave blank. The most up to date form will not identify a specific individual as the Deputy SHPO. See website for correct form.
		Item 4	For NPS use only, leave blank
		Item 5	<ul style="list-style-type: none"> · Is Ownership of Property marked? (more than one may be marked) · Is the Category of Property (only one) marked? · Is the Number of Resources within Property completed and totals correct? · Is the Number of Previously Listed Resources completed or marked n/a?
		Item 6	Are the Historic and Current Functions completed (one per line) and compatible with categories in Bulletin 16A (available on website)?
		Item 7	<ul style="list-style-type: none"> · Is Architectural Classification completed with a category and subcategory from Bulletin 16A? · Are Materials categories completed and consistent with Bulletin 16A? · Is the Narrative Description on Continuation Pages box checked?
		Item 8	<ul style="list-style-type: none"> · Is the Criteria marked consistent with the Section 8 summary paragraph? · If appropriate, is a Criteria Consideration marked? · Are the correct Areas of Significance marked and consistent with the Section 8 summary paragraph? · Is the Period of Significance completed and consistent with the Section 8 summary paragraph? · Are Significant Dates completed or marked n/a? Do the dates fall within the period of significance? Are they mentioned in the Section 8 summary? · Is the Significant Person marked n/a, unless criterion B is checked? · Is the Cultural Affiliation marked n/a, unless Criterion D is checked? · Is the Architect/Builder completed (last name first) or marked Unknown? · Is the Statement of Significance on Continuation Pages box checked?
		Item 9	<ul style="list-style-type: none"> · Is the Previous documentation on file marked, if appropriate? (usually left blank) · If a Federal Part 1 Tax Credit application has been submitted to the NPS, is “Preliminary determination of individual listing . . .” checked? · Is the Primary location of additional data marked? (usually marked SHPO)
		Item 10	<ul style="list-style-type: none"> · Acreage should be completed to the nearest tenth (0.0), or if less than one acre write as “less than one acre.” · Is the Latitude/Longitudes complete? Are they accurate? Do they match the coordinates on the associated map? Leave UTM field blank or contact the SHPO for guidance on completing this field. · Are the verbal boundary description and boundary justification included on a continuation sheet?
		Item 11	<u>Items to be completed in full.</u> <u>Photographs and figures:</u> <ul style="list-style-type: none"> · Has the Photo and Figure log been completed and a list of photos provided in this section? · Has the camera direction been noted for each photograph? · If figures are imbedded in the narrative, are the associated page numbers added to the figure log?

			· Are the photographs keyed to a map on a continuation page?
		Continuation Sheets	<u>Continuation Sheets:</u> · Are the Section numbers and page numbers (including jacket) numbered consecutively (regardless of Section)? · Are the headings of each page filled out correctly and is the name of multiple listing completed or marked n/a? · Are all the photographs and figures referenced in the nomination?
			<u>Section 7</u>
			· Does Section 7 have a summary, setting, property description, and integrity subsections?
			· For district nominations, are there individual descriptions of primary resources that include descriptions and construction dates of any counted outbuildings? Is the contributing status noted for each counted resource? Do the descriptions explain why a counted resource is non-contributing?
			· If a single site nomination, is there a subsection in Section 7 for the interior description with the current floor plans tied in?
			· Are construction and alteration dates identified? Are photo references tied into the description as features are described in Section 7?
			<u>Section 8</u>
			· Does Section 8 have a summary, narrative, and conclusion?
			· Does Section 8 contain a clear and coherent argument for the selected area(s) of significance, level(s) of significance, and period(s) of significance?
			· If applicable, does Section 8 contain appropriate comparisons?
			<u>Section 9: Bibliography:</u>
			· Is the Bibliography completed in full using the Chicago/Turabian style accurately?
			· Does the Bibliography account for all sources cited in the document (footnotes, figures, etc)?
			· Are footnotes completed in full using the Chicago/Turabian style accurately?
			<u>Figures/Maps:</u>
			· Do figure captions contain a source? Do the figure numbers and descriptions match those in the Figure Log?
			· Are current floor plans included (single site only)
			· Has a contextual map been included as a figure that notes Latitude/Longitude location and coordinates? (Optional)-Has a separate KML or KMZ file been provided?
			· For single sites: Site map: Has a site map been added and referenced in Section 7? Are other resources noted in the resource count included on the map with a contributing or non-contributing status? Is a boundary line included?
			· Is a detailed boundary/footprint map provided (for Historic Districts only)? Are the names of streets included? Do they note contributing and non-contributing status of counted resources? Are street numbers or other numbers assigned to primary resources? Is a boundary line included?
			· Do all maps have a North arrow and scale?
		Accompanying Materials	<u>Accompanying Materials</u> · Has the nomination been saved in Word format (do not submit a .pdf) and labeled per NPS standards?
			<u>Photographs:</u>
			· Have color TIF images been provided at the minimum required 1200x1600 pixels at 300 ppi?
			· Are they labeled according to NPS Standards?
			· Is there adequate but not excessive photo coverage?

Appendix II

National Park Service “White Paper” on Parking Lots in Historic Districts

DRAFT

Parking Lots in Historic Districts

A National Register White Paper

Barbara Wyatt, barbara_wyatt@nps.gov, 7-16-09

This paper is not intended to replace information in the National Register Bulletins and other NPS publications. It is intended as a supplement, and if discrepancies are found between this paper and other NPS publications, the existing publications should be considered correct. Comments are welcome and should be directed to the author. After review and discussion, the substance of this paper may be incorporated into future publications.

The purpose of this paper is to clarify how parking lots should be classified, counted, described, and evaluated in National Register historic district nominations. All too often, National Register of Historic Places nominations for historic districts completely ignore surface parking lots in the description, inventory, assessment of integrity, and resource count. In some cases they are dismissed as “vacant lots,” even if they exhibit substantial construction in paving, retaining walls, bollards, etc. In keeping with *Merriam-Webster’s Collegiate Dictionary* (1998), which defines *vacant* land as land that is “not put to use,” such parking lots are unfairly marginalized as too inconsequential to address. In fact, a parking lot is a *use*—often with substantial impact on the streetscape and character of a historic district. There are other reasons to address parking lots in historic districts: increasingly, they are coming of age as 50-year-old resources and in some cases the archeological potential of parking lots has been noted.

What Type of Resource?

The National Register bulletins have been somewhat mute on the subject of parking lots, so National Register preparers and reviewers have used information that may seem parallel as a means of interpretation. Unfortunately, some of the information is contradictory. For example, the following passage from *How to Complete the National Register Registration Form* has been used as a justification for not addressing parking lots classified as “vacant lots” in historic districts:

Count gardens, parks, vacant lots, or open spaces as “sites” only if they contribute to the significance of the property (page 17).

If parking lots are considered vacant lots—noncontributing and not counted—National Register preparers assume they do not need to be inventoried or described. In fact, district nominations have been submitted with the presence of a large surface parking lot only discerned from the sketch map. Parking lots may be categorized as *vacant lots*, simply because the bulletins do not define a vacant lot. In historic districts, *vacant lots* may encompass land that seems superfluous or to lack meaning. Besides parking lots, *vacant lots* probably include lots vacated of buildings and lots that were never developed with buildings, but were used for other purposes, such as gardening and support activities for commercial ventures. These examples may fit the dictionary definition of “vacant” more clearly (land that is not put to use), although, as in the past, today such lots may be used for gardens, activities, or informally used for parking.

Parking lots typically exhibit a substantial amount of construction, including several tons of asphalt or concrete, and perhaps bollards, planting beds, meters, walls, and fencing. Such parking lots are far from *vacant* and they are more accurately classified as *structures*. The *How To* bulletin defines *structures* as “those functional constructions made usually for purposes other than creating human shelter” (page 15). Among the examples are *roadways* and *systems of roadways and paths*. Parking lots are not explicitly categorized, but as a property type that is not constructed for habitation and is similar in construction to a roadway, they generally meet the definition of *structure*. However, in situations where cars are parked on a generally unimproved lot, and where archeological research has revealed important information about the lot, they may be classified as *sites*.

Other National Register bulletins somewhat confuse the categorization of landscapes and landscape features, including parking lots. In the bulletin *How to Evaluate and Nominate Designed Historic Landscapes*, “parkways, drives and trails” are considered types of *designed historic landscapes* (page 2). The bulletin for designed landscapes does not specify whether parkways, drives, and trails are sites, districts, or structures, but *How To Complete the National Register Registration Form* includes “designed landscapes” among the examples of *sites* (p. 15). The bulletin *Guidelines for Evaluating and Documenting Rural Historic Landscapes* states that rural historic landscapes are listed in the National Register as either *sites* or *historic districts* (page 3).

Aside from their classification and evaluation, it is critical to discuss the impact of parking lots on the integrity of the entire district, the streetscape, or the adjacent property. Too often such resources have been treated as nonentities, rather than physical components of a nominated property. Parking lots can create “holes” in historic districts or they can perpetuate spaces that were traditionally open. For example, a public parking lot may have begun as the yard of a carriage works, later served a car dealership, and today serves as a public parking lot. Historic districts that have a number of surface parking lots can present serious integrity issues, so it is essential to include descriptions and an assessment of their impact on the district.

Guidelines for Addressing Parking Lots

The classification of parking lots has not been clearly established, and arguably they could be sites or structures, depending on the bulletin cited. This white paper suggests standardizing the parameters for the classification of parking lots so that all National Register nominations address them uniformly. Therefore, the following guidelines pertain to the classification, enumeration, description, and evaluation of parking lots located in historic districts. To date, parking lots generally have not been valued as individually significant resources, but if they are in the future, other considerations will be added.

1. A parking lot should be categorized as a *structure* in Section 5 of the National Register form, because parking lots are “functional constructions made usually for purposes other than creating human shelter” (p. 15, *How To Complete the National Register Registration Form*).
2. A parking lot must be counted as a contributing or noncontributing resource (structure) in Section 5 of the National Register form, unless it is a small area set aside for parking, near a contributing or noncontributing building, site, structure, or object. “Small” can be

defined by the preparer, but may include ten or fewer parking spaces. Parking lots that are “substantial in size and scale” need to be evaluated and counted—as opposed to “minor” resources that are considered too small to count, such as small sheds and grave markers (p. 17 *How To . . .*). Lots that are dedicated to parking (with a discrete legal description and without associated buildings, structures, sites, or objects) should be counted regardless of size. If parking lots are not counted, the inventory in Section 7 should explain the omission.

3. Parking lots must be listed, briefly described, and evaluated in the property inventory in Section 7 and indicated on the sketch map. The description should address previous uses of the site, if known, particularly during the period of significance, and identify the approximate date of construction of the parking lot. If parking lots in a historic districts share a common general history or character, it may be possible to describe them as a property type, rather than individually. Even in this case, however, the individual lots should be included in the inventory and labeled on the district map.
4. Parking lots should be evaluated as *noncontributing* if their construction post-dates the Period of Significance or if they are not relevant to the associated Criteria and Areas of Significance. They should be evaluated as *contributing* if they were built during the Period of Significance *and* their significance pertains to the associated Criteria and Areas of Significance. In addition to evaluating the individual parking lot as contributing or noncontributing, its impact on the streetscape and on the character of the larger historic district or property should be discussed.
5. An archeological site found below, adjacent to, or overlapping a parking lot should be independently counted and evaluated. See *Guidelines for Evaluating and Registering Archeological Properties* for further information.
6. If individual owners are notified of the proposed nomination, owners of parking lots must also be notified.

Conclusion

Parking lots have been constructed for a specific purpose and their construction generally is regulated by building and zoning codes. As such, they can influence the historicity and architectural quality of historic districts. Increasingly, parking lots fall into the Period of Significance for the district in which they are located. Seldom is it appropriate to classify a parking lot as a “vacant lot,” nor is it appropriate to routinely consider them “minor resources” that are not counted. The archeological potential of parking lots may be significant, particularly if they are the site of an earlier building or other use. The use of these guidelines should eliminate the confusion that has been evident in the treatment of parking lots in National Register nominations.

Appendix III

EXHIBIT "A"⁴⁶

PROPERTY OWNER SHEET

Name of Property:

Location of Property (street/city/county):

I, _____, hereby certify that the following constitutes the complete list of owners of record for the property named above. This information was obtained from the

NAME:

ADDRESS:

CITY:

STATE:

ZIP CODE:

(Signature of Nomination Preparer)

Typed name and title:

Date:

Note: If nomination affects multiple property owners, please contact the SHPO for details on how to document all property owners.

⁴⁶ The Exhibit A and B forms used at the Missouri SHPO are based upon those utilized at the Oklahoma SHPO, Oklahoma Historical Society.

Appendix IV

EXHIBIT “B”⁴⁷

ELECTED OFFICIALS SHEET

Name of Property:

Location of Property (street/city/county):

For the above referenced property, provide both:

Mayor’s Name (if within a city or town):

Address:

City/State/Zip Code:

AND

Name of the Presiding Commissioner, County Commissioners:

Address:

City/State/Zip Code:

⁴⁷ Ibid.

Appendix V

Instructions for Providing District Owner Information

Instructions for Providing District Owner Information

Please provide complete owner information for each property included in the nomination (including parking lots, vacant lots, sites, etc.) in the associated Excel sheet. Note that **non-contributing** sites are accounted for in their own column. All other resources (including **contributing** sites) should be accounted for in the “Contributing” and “Non-Contributing” columns.

Complete “Business or 2nd Owner” field with the business name as applicable.

If the property is owned by a business and an individual’s name is not provided, leave the fields “First Name” and “Last Name” blank.

For properties owned by the City, complete “First Name” and “Last Name” with the Mayor’s name.

If the property belongs to two individuals with the same last name, such as a husband and wife, include both first names in the “First Name” column. For example:

First Name	Last Name	Business or 2nd Owner	Last Name of 2nd Owner	Address	City	State	Postal Code	Property Address
Frank and Nancy	Drew	Preservation Investigation		101 Preservation Street	Old Town	MO	65791	202 Main Street

If a property has multiple owners with different last names but the same mailing address, include the second owner’s name in the “Business or 2nd Owner” field. Include the 2nd Owner’s last name in the “Last Name of 2nd Owner” field. Otherwise, leave blank.

Here is an example of what that would look like:

First Name	Last Name	Business or 2nd Owner	Last Name of 2nd Owner	Address	City	State	Postal Code	Property Address
Frank	Hardy	Nancy Drew	Drew	1802 Old Town Road	Old Town	MO	65791	202 Main Street

If a property has multiple owners with different mailing addresses, enter their information in separate rows but **make sure when adding numbers for resources (see example below) that the resource is not accounted for more than once**. Further, if an address has more than one contributing or noncontributing resource (a contributing house and a contributing garage for example) make sure all are appropriately accounted for in the “Contributing” and “Non-Contributing” columns. An example:

First Name	Last Name	Business or 2nd Owner	Last Name of 2nd Owner	Address	City	State	Postal Code	Property Address	Contributing	Non-Contributing	Non-Contributing Sites	On Map?
Nancy	Drew			1802 Old Town Road	Old Town	MO	65791	202 Main Street	2	1	0	X
Frank	Hardy			101 Preservation Street	Jefferson City	MO	65101	202 Main Street	0	0	0	X

Instructions for Providing District Owner Information

In the above case, 202 Main Street has two owners with separate mailing addresses. It also has a contributing house with a contributing garage and a large noncontributing fountain (object).

The X under the "On Map?" column indicates that you have checked the district map and verified that each resource is clearly accounted for.

When all data is entered, check the property count total against the nomination. Each property in the nomination, contributing or noncontributing, **including sites¹** should have property owner information provided and the resource count should match the resource count provided in the nomination. You can check this quickly using the AutoSum function in Excel. To utilize this function, first select the data in each column that you want to total. Then go to the "Home" tab and find AutoSum (see image →).

When you click AutoSum it will automatically provide you with a total at the end of the column. Make sure that number matches your total resource count in the nomination.

Please submit the completed Excel sheet by the revision due date.



J	K	L
Contributing	Non-Contributing	Non-Contributing Sites
2	1	0
0	0	0
1	0	0
1	0	0
0	1	0
3	0	0
2	0	0
0	2	0
2	1	0
0	0	1
0	1	0
2	0	0
1	1	0
1	0	0
15	7	1

This is the total line that automatically appeared when I highlighted the fields I wanted to total and clicked "AutoSum"

¹ NOTE: Even though non-contributing sites are not included in the resource count on the nomination jacket, they still require owner information as applicable. Do not forget to account for these in the "Non-contributing Sites" column in the database. Only resources included in the nomination jacket resource table should go in the "Contributing" and "Non-Contributing" columns.

Appendix VI

District Owner Information Template

	A	B	C	D	E	F	G	H	I	J	K	L	M
1	First Name	Last Name	Business or 2nd Owner	Last Name of 2nd Owner	Address	City	State	Postal Code	Property Address	Contributing	Non-Contributing	Non-Contributing Site	On Map?
2													
3													
4													
5													
6													
7													
8													
9													
10													
11													
12													
13													
14													
15													
16													
17													
18													
19													
20													
21													
22													
23													
24													
25													
26													
27													

Appendix VII

ONLINE RESOURCES

The Missouri Guide to the National Register Process

<https://mostateparks.com/sites/mostateparks/files/National%20Register%20Guide.pdf>

MISSOURI STATE HISTORIC PRESERVATION OFFICE

Homepage

<https://mostateparks.com/shpo>

Eligibility Assessments: Guidance, Instructions and Form (scroll to the bottom for forms)

<https://mostateparks.com/page/85626/my-property-eligible-listing-national-register>

The National Register of Historic Places Guidance and Forms (scroll to the bottom for forms)

<https://mostateparks.com/page/85341/national-register-historic-places>

Missouri National Register Listings

<https://mostateparks.com/page/84436/missouri-national-register-listings>

MOACHP Meeting Dates and Submission Requirements

<https://mostateparks.com/page/85656/nominations-national-register>

Architectural Survey Guidance, Standards and Forms (scroll to the bottom for forms)

<https://mostateparks.com/page/86111/survey>

List of Architectural Surveys Available Online

<https://mostateparks.com/page/85671/sampling-architectural-surveys>

Historian/Architectural Historian Consultant's List

<https://mostateparks.com/page/84241/archaeology-and-historic-preservation-consultants-list-and-professional-qualifications>

NATIONAL PARK SERVICE

National Register Bulletin 15: *How to Apply the National Register Criteria for Evaluation*

https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf

National Register Bulletin 16A: *How to Complete the National Register Registration Form*

<https://www.nps.gov/subjects/nationalregister/upload/NRB16A-Complete.pdf>

National Register Bulletin 16B: *How to Complete the National Register Multiple Property Documentation Form*

<https://www.nps.gov/subjects/nationalregister/upload/NRB16B-Complete.pdf>

National Register Bulletin 23: *How to Improve the Quality of Photographs for National Register Nominations*

<https://www.nps.gov/subjects/nationalregister/upload/NRB23-Complete.pdf>

National Register Bulletin 39: *Researching a Historic Property*

<https://www.nps.gov/subjects/nationalregister/upload/NRB39-Complete.pdf>

National Register Electronic Map Policy Factsheet

https://www.nps.gov/subjects/nationalregister/upload/GIS_Guidance_2013_05_15_508.pdf

National Register Photo Policy Factsheet, updated May 2013

https://www.nps.gov/subjects/nationalregister/upload/Photo_Policy_update_2013_05_15_508.pdf

National Register Publications (link includes “white papers”)

<https://www.nps.gov/subjects/nationalregister/publications.htm>

National Register Webinars

<http://www.nps.gov/nr/publications/guidance/pastwebinars.htm>

RESEARCH AND WRITING

Plagiarism 101

<http://www.plagiarism.org/>

Turabian Quick Guide

http://www.press.uchicago.edu/books/turabian/turabian_citationguide.html